IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

FIRST APPELLATE DISTRICT

DIVISION FOUR

CHURCH OF SCIENTOLOGY, INTERNATIONAL,
Plaintiff/Respondent,

vs.

GERALD ARMSTRONG,
Defendant/Appellant.

NO. A075027

CLERK'S TRANSCRIPT ON APPEAL

FROM A JUDGMENT MADE AND ENTERED
IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
MARIN COUNTY COURTS

VOLUME 26

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

MARIN COUNTY COURTS

DEPARTMENT 1

CHURCH OF SCIENTOLOGY, INTERNATIONAL, **Plaintiff,** **vs.** **GERALD ARMSTRONG,** **Defendant.**	**No. 157680**

GARY W. THOMAS	**JUDGE**
JOHN P. MONTGOMERY	**COURT EXECUTIVE OFFICER**
ELAINE PASSARIS	**REPORTER**

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October 23, 1992

Republican National Committee
310 1st Street SE
Washington, D.C. 20003

Dear Republicans:

Greetings. I am the founder of the Organization of United Renunciants (OUR), which the accompanying papers concern, and The Gerald Armstrong Corporation, which owns some of the rights to some of my works. I am by profession an artist, writer and philosopher.

I believe that these papers contain a worthy idea and I ask that you take them seriously.

I have had, even to me, startling success in getting signatures to OUR Pledge, and I do expect that in the not too distant future we will reach OUR critical number. I urge the recipients of these materials, therefore, to do what is in their heart and power to ensure the peaceful transition of the country's values.

I do not believe that I have the system and nothing but the system. I have thought about this subject a great deal more than I have written about it, and my writing on the subject is neither complete nor polished. I, therefore welcome your questions and suggestions.

I am enclosing a list of references for your ease of investigation.

God's blessing to all.

Gerald Armstrong
for the Organization of United Renunciants
P.O. Box 2711
San Anselmo, CA 94979

Recipients of OUR October 23, 1992 letter and document package:

President George Bush
The White House
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Washington, D.C. 20500

Bill Clinton
Clinton for President
P.O. Box 615
Little Rock, AR 77203

Ross Perot
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Dallas, TX 75240

Republican National Committee
310 1st Street SE
Washington, D.C. 20003

Rep. Barbara Boxer
3301 Kerner Blvd
San Rafael, CA 94901

Sen. John Seymour
Republican Headquarters
4340 Redwood Highway, Suite F219
San Rafael, CA 94903

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Gov. Pete Wilson
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Sacramento, CA 95814

New York Times
229 West 43rd Street
New York, NY 10036

Time Magazine
Time & Life Building
Rockefeller Center
New York, NY 10020-1393

Los Angeles Times
145 South Spring Street
Los Angeles, CA 90012

San Francisco Chronicle
901 Mission Street
San Francisco, CA 94103-2988

Marin Independent Journal
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Novato, CA 94949

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Los Angeles, CA 90067
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OUR PLEDGE

We, the Organization of United Renunciants, being of sound mind and good intentions, with our faith in God, and out of a love of our fellows, our world and country, do hereby pledge:

1. In recognition of its valuelessness, and unless someone comes up with a better plan before November 11, 1993, we will, from that date forward, have nothing to do with money.
2. On November 11 we will forgive all debts owed to us.
3. From November 11 forward we will pay no taxes, buy no insurance, deal with no banks and keep no financial records.
4. From November 11 forward, we will work as called for the peace and prosperity of all; but we will not work for money.
5. From now on we will peacefully resist tyranny and temptation.

(Sign; Date; Print Name, Address and Phone Number)

1. ______________________________

____

2. ______________________________

____

3. ______________________________

____

4. ______________________________

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5. ______________________________

____

6. ______________________________

____

7. ______________________________

____

Organization of United Renunciants, PO Box 2711, San Anselmo, CA 94960

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OUR DEADLINE

The resolution of all planetary problems, except those generated by unnecessary resistance to the resolution, is now with us. It arrived as a Godsend.

Its implementation will be peaceful, kind, fair and safe. It will not cost anything. It is so simple a child would understand it.

Implementation is possible immediately except for two obstacles: not enough people know of the plan; and significant anticipated unnecessary resistance. This document will bring to people word of the plan. The setting of OUR deadline, November 11, 1992, will confront all resistance.

The plan calls for a single act of courage on that date by somewhere between one and eleven percent of the national population. Because it will be done on that specific day by courageous souls linked in purpose and faith, its effect will be heroic and irreversible.

There is sufficient time before November 11, for somewhere between one and eleven percent of the population to forge the needed link. The Organization of United Renunciants is dedicated to linking people for this plan, providing information and understanding to all who ask, and protecting its participants.

I am the founder of the Organization and responsible for its writings and decisions. I welcome communications and accept help. I have no designs on the U.S. Presidency, which will never be available to me because I was not born a citizen. I am, however, eligible for the Prime Ministership, a job I have also not sought, of Canada, an even bigger country. Regardless, I am as American as Mahatma Gandhi.

My plan is based on the fact that money has no value. I wrote about this in 1988 in an essay I called "A Crash Course In Speculation." Between then and now various events and realizations occured which led to the plan and made it timely. And everything has continued to convince me that money indeed has no value.

George Bush's deadly deadline to Saddam Hussein gave me the idea of issuing OUR deadline. The fact that it was OUR deadline resulted in the Organization of United Renunciants. Organizing renunciants made sense because I had, in August 1990, as a result of understanding the Persian Gulf crisis, and accepting the idea of renunciation as guidance, given away all my money, real estate, paper holdings and personal effects and forgiven all debts owed me.

November 11, 1992, since it is a week after national elections, since things don't take as long as they took, and since it is to this country's leaders that the deadline is issued, is the perfect day. And the ultimatum to the leaders is simply this: come up with a better plan or we will, starting November 11, have nothing to do with money.

If by November 11 we do not have enough renunciants to effectuate our ultimatum we will set a new deadline; April 15, 1993, for example. We will not call for our members to have nothing to do with money on any deadline date unless we are certain that we have the number necessary to achieve our goal: the peaceful transformation of the system of management of the affairs of government and people

The Organization of United Renunciants asks for no money. Neither does it refuse money. All money received will be used, until it is no longer currency, to inform and maintain communication between its members. Neither I, nor anyone else in OUR, will receive any monetary remuneration for our work. If the resources necessary to do the work are not provided, it merely will not be done.

G.

Gerald Armstrong

c 1992 The Gerald Armstrong Corporation (415)456-8450

PRESENT CURRENCY

It goes without saying that it has been said that money is a means of exchange. It has been that for a long time. It has at least that purpose in every country of every political coloration and to every reasonably rational individual including those who have none and those who have renounced it.

Until recently money was arguably as good as any other conceivable means of exchange and so it remained the predominant currency; and in fact is defined almost universally as currency. And currency is defined as a means of exchange. Now, unlike before, there is the computer. It is a far better, and much cheaper, means of exchange.

Even now money and the computer perform the same function: they direct the movement of things. Money directs wheat into flour, tomatoes into bottles, olives into oil and pizza into ovens; cars into showrooms and thence up driveways; bodies into bikinis and onto operating tables; cable into TVs; phone calls along wires; gas into tanks; presidents into white houses. Money directs much of what gets done all day and all night everywhere. It just does a terrible job of it.

The computer directs planes onto flight decks; missiles into targets, ink to printers. And it directs many of the things that money too directs: cars into showrooms, calls along wires, even grain into flour. The computer does, except for one glitch, a great job. Poetically, replacing money with the computer as currency repairs the glitch.

The glitch is a programming error, immediately correctable, which arises from the assignment of value to money in computations. Money has no value, and assigning it value, or the inclusion of it at all in any computation skews the result. The computer will always produce a wrong answer, just as man in his pre-computer wisdom has, when money of any assigned value other than zero, is entered into its computation. Remove money from any computation, and, all other data being reasonably accurate, the answer will be reasonably right.

There are meter maids and men who drive around our city streets in little gas vehicles chalking the tires of larger gas vehicles parked in these streets for no other reason than to make money. The men and maids grow nothing, feed no one, heal not a wound. Nor do they even bend over to pick up one scrap of the national tonnage of trash they drive by and wade through on their daily rounds. Their products are chalk dust, deadly gases, sebaceous glutei, wasted paper, wasted fuel and wasted lives.

Every day, using computers, a few men and women who have never missed a meal, buy zillions of tons of corn, beans and chickens, for no other reason than to make money. The same few sell the same commoditites for the same reason, to make money.

The commodities didn't move from their warehouses and the brokers didn't move from the glutei. While millions of men, women and children, who spend a lifetime missing meals, can't buy an ear of corn, a handful of beans or a chicken because they have no money.

Every day countless million of people drive to work and spend untold unhappy hours doing it for what is completely valueless - to make money. We clog our highways, pollute our planet, squander our resources, lie, cheat and steal for the same valueless purpose. We say we need jobs to make money to buy corn and chickens lest we starve. But all the money in the world, no matter how well watered and fertilized, can't grow a stalk of corn, and chickens won't eat the stuff. God grows all life and makes all things. Man can direct where some of the lifeforms and things go; the computer can be a better currency in that task.

Take doctors for example. They know that having more money thrust at them to perform better operations is stupid. They'd have to take off their gloves, lift their gown, pocket the cash, or even a check, wash their hands of lucre's filth, and call for a new pair of gloves. The patient expires. The doctor has to get more money to pay his escalating malpractice insurance. Money's only function in medicine is to slow productivity, and guarantee malpractice.

Eliminate money as currency and with it go malpractice awards and any need for an insurance industry. Doctors would still regulate their industry, and in a kinder, gentler fashion than its present governance. But the operations that got done would be those that are needed. And stupidities in the name of insurance would be not only not de rigeur but absurd.

There is the undeniable risk that perhaps unhappily for some the elimination of money might annihilate the advertising industry. After all, who would advertise if there wasn't money to be made in it? It is true that sectors of the ad industry would disappear. Who in his right mind, for example, would run an ad to sell a table, even his second one, when he could just give it to somebody who didn't have one. And would somebody who had just one table, if he were in his right mind, advertise to sell it because he didn't have enough money?

Truly, however, the ad industry can become the education industry; Madison Avenue populated by ed men. The best message wins. They can have real clients for a change, doing real things for real reasons. Each word can be memorable in its own right. And the ed men can stay at home more, lie less, live longer, love a lot, and stop sucking up to Phillip Morris.

Law is a worthy subject. Right now there are lawsuits being filed for no other reason than they make economic sense. Good people are not defended because they can't pay, and bad people are because they can. Remove money from judgments and legal consideration and American jurisprudence becomes rational and fair. Include money in justice's deliberations and its decisions will always be skewed and therefore unjust.

There is the question, of course, if people don't take money in payment, who will do the work. The immediate answer is, the same person who has been doing it. Bankers, brokers, insurance blokes and bookies obviously wouldn't have to show up. They can get real jobs of any kind they want and all the time in the world to learn a useful trade. There will be lots of people to take care of all the needed work. Bridges still need painting, but they don't need toll booths nor people to occupy them.

Anyone can figure out what jobs really need to be covered and what ones should be eliminated. For the most part people will be able to do ergonomically what they want to do; which is a bunch better than the way it is now with most people doing what they don't want to do because they need money, and unable to do what they're called to do or love to do because no one will pay them to do it.

The general rule regarding priorities is that they don't matter. Rules are always qualified by safety, courtesy and wisdom. Stupidity has no effect so it's silly to engage in it. Time is here as far as the eye can see, so don't be concerned about losing it. Except in matters of safety, courtesy and wisdom, where there's no time to be lost.

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WISDOM HAS NO DOWNSIDE

The resolution of problems is neither easy nor hard.

Government's one function is to feed people. Because this is so simple and takes such little time, and in fact people as a rule want to feed themselves, government can do all sorts of other things.

Elections in large part are the action of deciding which of vying political groups can do in the best way the best set of other things. If a political group does not even have the determination to feed people it should not be considered as a potential government. If a government can't feed people it not only has no business being a government it isn't one. Since every country, state, city or planetary space is owed a legitimate government, a group, acting as a government but not feeding its people, is standing in the way of the legitimate government. All the illegitimate governments of the world fall into this category.

The only answer to the national debt is to cancel it. At the same time cancel all debts owed to this country. It's too bad, perhaps, that the U.S. didn't cancel the debt owed to it back when it was a global creditor, but it's no less timely now. Maybe a little more embarrassing. I submit, however, that the nation can argue that not only did it not understsnd before now that money had no value, but there also wasn't the computer to zero things out.

We have ourselves to thank for the deficit, and we can thank God He didn't create it. Therefore it is unarguably in our hands to take care of it. The deficit's wonderful lesson is that the more gargantuan and ghastly it became the easier it was to see it really didn't exist and would disappear with the stroke of a pen. While we're at it we should disappear all debt of any kind anywhere. God did not create us indebted.

Some rich soul may argue that as a debtor nation we must honor the international commitments our debts imply. Thank God this country really is a superpower; who's going to argue with us? Of course it would become instantly clear to our global neighbors that to survive in a sane world they would want to cancel their debts as quickly as possible as well.

A better answer to the homeless problem is private ownership. Right now we're headed, in the name of capitalism, on a break neck tear toward total socialism. A few more recessionary squeezes and all property everywhere will be owned by the state and a few other faceless corporate fictions. It makes ever so much more sense for everyone to own where they are. Once that's taken care of, see who's out in the cold, and where the empty homes are. A perfect task for a computer. Landlords and ladies would be happy because they wouldn't be responsible for all the homes they don't live in.

There is no evidence that the employed eat more than the unemployed; in fact there is some evidence that the more employed someone is the less he or she eats. It is the indolent who have more time and space for eating. In any event, there is no reason for people to not be employed. In fact, it is impossible that anyone could be unemployed. Someone might not do his job, and might not show up where he was needed, but he would never be out of work.

The assignment of resources is local according to a distribution program passed by elected legislators. The program is the platform.

Fortunately, by eliminating money the nation's consumption of fuel will be manifestly reduced. So there won't be much of a need for oil drilling or coal mining for a while. And by that time there could be a prodigality of applicants for drilling or mining adventures.

There are lots of incentives in the world, the most valueless of which is money. But if money must be replaced with other incentives, its best replacements so far thought of are fame and vacations. Clean up your mess, see Paris in the springtime. Because business class, and the poor salesmen's economy class, will disappear, commercial airlines can retool to handle the burgeoning holiday-bound.

Since money has no value, more is no greater than less. The reason player salaries are embarrassing is that they render fatuous otherwise perfectly fine athletes.

Ask Joe Montana. He threw way more touchdowns when he was getting way less money.

Because so many people can't find work right now so many things don't get done.

Paint the house that needs painting. First.

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November 3, 1992

Rick Polito
Marin Independent Journal
150 Alameda del Prado
Novato, CA 94949

By Telecopier (415)382-0549

Re: **OUR PROGRAM**

Dear Rick:

I've given some more thought to your questions regarding who would do the work, who would clean the sewers, who would bother to show up and so forth if what needed to be done was not done for money.

Initially it is predicted that everyone would experience both some relief and some enthusiasm. To not only not have to worry about money while working in the sewer but to not have to work in the sewer at all could not help but be a relief to any sewer worker who enjoyed neither the worrying nor the work. If someone did not enjoy the worrying but enjoyed the work he too would experience relief. In that no one hereafter need worry any longer it might turn out that sewer work could be as enjoyable as any other profession. If someone enjoyed worrying about money, then whether he enjoyed working in the sewer or not, clearly, as Ross Perot might say, money's elimination is not for him.

Initially as well, working for something different from money would be such a departure from the way things were that the present pervasive job boredom would have to give way to excitement. Since the elimination of money would occur on one day across the country, the population would be educated in advance of that day in the reasoning behind the elimination, and what to expect and how to function on their non-money-motivated jobs and in a moneyless society. The education process can itself produce a new enthusiasm for our jobs and lives.

If sewer work really was so distasteful or dangerous the men and women who perform it should be the most adulated of our servants. If they are not paid money for what they do they will be seen for the heroes they are. Hence give them great vacations and make their faces household words.

It is far more important to give whoever is asked to do the job the materials with which to do it than to pay him or her money. That's the task of management, who can still manage without money, and undoubtedly more efficiently, and hence sanely, than present management, which pays homage to the false god, **Bottomline**.

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Finally, regarding the American people's morality, and therefor ability to work for a higher reason, I remain convinced that in truth the real work done even now is done **for** that higher reason. And I remain convinced that we are moving into the Age of Wisdom when nationally and globally that higher reason will be understood, and will be strived for far more passionately than money ever was.

Please feel free to call at any time if you have any questions, or for any reason.

Yours sincerely,

Gerry Armstrong
Organization of United Renunciants
715 Sir Francis Drake Blvd
P.O. Box 2711
San Anselmo, CA 94979
(415)456-8450
FAX 456-5318

Marin Independent Journal, Wednesday, November 11, 1992

IJ photo/Frankie Frost

CASH CRITIC: Gerald Armstrong of San Anselmo reflects on how the world would be a better place without money

Is money the root of problems?

Critic of cash, credit urges monetary abolition

By Richard Polito

Independent Journal reporter

Gerald Armstrong has an idea for dealing with the national debt — write it off. Forget it. It doesn't exist.

It's that easy.

The novel prescription for fixing the fiscal fiasco is only part of Armstrong's larger message that money should be abolished. No more pay checks, no more loan payments, no more taxes, and forget that $20 you owed your brother-in-law.

Bank presidents would clean up litter. Donald Trump could get a real job. The Financial District would be a ghost town with marble lobbies — and lots of parking.

And it all starts today.

In a rare moment of realism, Armstrong admits today's deadline "is probably not going to be achieved."

Renouncing cash, credit

Armstrong, self-proclaimed founder of the Organization of United Renunciants, set the date for people who have taken his "pledge of renunciation" to stop using money. Fellow renunciants will renounce all cash and credit, stop taking money, stop paying with money, forgive all their debts and stop keeping financial records.

The critic of credit has already put his money where his doubts are. He gave it all away. And it was more than pocket change.

Armstrong won an $800,000 settlement in a harassment suit against the Church of Scientology six years ago. Once a member of the inner circle, he is now a vocal critic.

Armstrong doesn't expect everyone to buy in from the start, just "somewhere between 1 and 11 percent."

He's a tad short. Armstrong can count only a handful of friends as converts, but he is trying to get the word out. Detailed proposals have gone out to Bill Clinton, Ross Perot and Pete Wilson (no one has tapped him for an economic advisory post just yet.) He has also written to the New York Times and other mega-media.

Ted Koppel has not called.

Money considered valueless

Armstrong is not discouraged.

The monetary messiah insists there is much about daily life that will not change. People will still go to work, shop at the market and pick out a new car every few years. They just wouldn't exchange any money along the way.

Money, in Armstrong's eyes, has no value and the existence of money has created entire industries that do nothing more than transfer mythical essences of value from one account to another.

In Armstrong's cashless Utopia, there would be total employment because people could do jobs they wanted to do and companies could employ more workers because they would not have to pay them. Farmers would still farm. Autoworkers would still make cars. Sewer workers would still shovel sludge.

And Disneyland would no longer charge admission.

EXECUTIVE DIRECTIVE

OSA INT ED 19
ALL SCIENTOLOGISTS
PUBLIC NOTICE BOARD
STAFF NOTICE BOARD

20 September 1984

SQUIRRELS

The following people have demonstrated that they cannot be trusted with the religion of Scientology or Scientologists. Their actions are destructive and aimed at the enslavement rather than the freedom of man.

Dede Voegeding
Kima Douglas
Gerry Armstrong
John Nelson
Laurel Sullivan
David Mayo

The above named squirrels have attempted to taint government with their false reports.

They have deliberately held policy up to scorn and altered such policies to suit their own destructive end.

Some of these squirrels have offered false testimony to the IRS in order to protect their overts against mankind and their only road out of this universe.

Several of them have misrepresented Scientology practices to the FBI or Justice Department in a futile attempt to taint the minds of the government and the courts against the Church of Scientology.

They have supported psychiatric aims and principles over Scientology principles in their misrepresentations to Department of Justice representatives as well as Boston lawyer Michael Flynn.

They have turned from ethical and moral Scientology principles by demanding no ethics be applied to them or by them.

Several of them have spoken out against Scientologists in good standing to the IRS in a hope that they might escape from their own destructive acts and shift attention from themselves and their crimes.

They have altered and assisted in the alteration of Tech in an attempt to seal off the bridge to those who have fallen prey to their destructive intentions.

Their continued harmful acts to themselves and their continued desire to drag others to the level of beasts and animals devoid of spiritual qualities places them in the psychiatric camp of those who manufacture madness for profit.

Therefore, be it known that these acts of spiritual destruction and cries for no ethics, no morals, and no policy, have separated them from the body of the ethical and practicing Scientologists of this planet.

Dedicated Scientologists need not support them until they have fully recanted and fully fulfilled all of the requirements of the Ethics and Justice codes dealing with suppressives and suppressive acts.

This ED is written that those who are not informed as to the acts of those named above may now be so informed.

It is written so that those who are not Scientologists may be warned that these individuals do not represent the Church or the religion of Scientology in any capacity.

Their only terminal is the International Justice Chief.

CO OSA INT

Authorized by
AVC INT

for the
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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INTERNATIONAL

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; DOES 1 through 25, inclusive, Defendants.	CASE NO. BC 052395 EX PARTE APPLICATION FOR ORDER TO SHOW CAUSE WHY GERALD ARMSTRONG SHOULD NOT BE HELD IN CONTEMPT; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATIONS OF LAURIE BARTILSON AND KENDRICK L. MOXON AND SUPPORTING EXHIBITS DATE: December 31, 1992 TIME: 1:30 p.m. DEPT: 88 DISCOVERY CUT-OFF: None MOTION CUT-OFF: None TRIAL DATE: May 3, 1992

TO DEFENDANT AND GERALD ARMSTRONG AND HIS COUNSEL OF RECORD:

Notice is hereby given that on December 31, 1992 at 1:30 p.m., or as soon thereafter as the matter may be heard, in Department 88 of the above-entitled court, located at 111 North Hill Street, Los Angeles, California 90012, plaintiff Church of Scientology International ("Church") will move for an order from this Court directing defendant Gerald Armstrong ("Armstrong") to appear and to show cause why he should not be held in contempt of this Court and criminally sanctioned for such contempt. This application is made on the ground that Armstrong has knowingly violated this Court's May 28, 1992 preliminary injunction order by voluntarily assisting at least six persons litigating or otherwise pursuing claims against the Church, affiliated Churches of Scientology and/or Church staff. All of the targeted Churches of Scientology and staff are included within the group of protected persons referenced in the May 28, 1992 Order. The six persons who Armstrong has admittedly assisted since May 28, 1992 include Richard and Vicki Aznaran. Armstrong's earlier assistance to the Aznarans was central to the Church's successful preliminary injunction motion in this case.

While the Church has attempted to obtain, informally, Armstrong's compliance with this Court's May 28, 1992 Order during the past six months, such efforts have been repeatedly rebuffed by Armstrong. As such, the Church comes to no alternative but to submit this application. Coupled with his post-May 28, 1992 pronouncements that he has no intention of complying with any such order of the Court, Armstrong is clearly flaunting the authority of this Court in a manner that should be criminally sanctioned by fine and/or imprisonment under Code of Civil Procedure § 1218. If this Court does enter a finding of such contempt pursuant to Code of Civil Procedure § 1209, et seq., the Church submits that Armstrong's actions also warrant referral to the District Attorney for misdemeanor prosecution under Penal Code § 166(4).

Defendant Armstrong has been notified of this Application pursuant to Law and Discovery Policy Manual Para. 261, et seq. [Declaration of Kendrick L. Moxon.]

This application is based upon the attached memorandum of points and authorities, the attached Declaration of Laurie Bartilson and other supporting exhibits, the pleadings and records on file in this case and such further evidence and argument as may be allowed at the hearing on this application.

Dated: December 31, 1992

Respectfully submitted,

Andrew H. Wilson
WILSON, RYAN & CAMPILONGO

BOWLES & MOXON

By: ______________________
Laurie J. Bartilson

ATTORNEYS FOR PLAINTIFF
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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MEMORANDUM OF POINTS AND AUTHORITIES

I.

INTRODUCTION

Plaintiff Church of Scientology International ("the Church") seeks an order from this Court that will halt defendant Armstrong's repeated, deliberate violations of the May 28, 1992 preliminary injunction order ("May 28 Order"). The May 28 Order bars Armstrong from voluntarily assisting persons who are, inter alia, litigating or intending to litigate against the Church, its affiliated Churches of Scientology and their staffs. From post-injunction discovery in this case, a bizarre letter written by Armstrong to plaintiff's counsel and copied to 35 others, and, mostly recently, the receipt by plaintiff's counsel of a videotaped interview of Armstrong with at least one active anti-Church litigant, it is clear that Armstrong -- true to his June 24, 1992 sworn assertion that he would never comply with the May 28 Order -- has embarked on a willful, knowing and defiant campaign to violate that Order by aiding persons preparing prospective lawsuits or actually litigating against the Church, including, again, Richard and Vicki Aznaran. Indeed, Armstrong has sworn under oath that he has no intention of complying with this Court's order; every attempt made by plaintiff to obtain compliance has been met with derision, defiance and concocted claims of "privilege." It is for these actions, enumerated in the supporting declaration of Laurie J. Bartilson, that Armstrong should be made to show cause why he should not be found to be in criminal contempt of the May 28 Order.

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II.

FACTUAL STATEMENT

A. The May 28 Order and Armstrong's Sworn Intention to Disregard It

The May 28 Order clearly states its prohibitions against Armstrong's voluntary assistance of claimants adverse to the Church:

> Defendant Gerald Armstrong, his agents, and persons acting in concert or conspiracy with him (excluding attorneys at law who are not said defendant's agents or retained by him) are restrained and enjoined during the pendency of this suit pending further order of this court from doing directly or indirectly any of the following:
>
> Voluntarily assisting any person (not a governmental organ or entity) intending to make, intending to press, intending to arbitrate, or intending to litigate a claim against the persons referred to in sec. 1. of the "Mutual Release of All Claims and Settlement Agreement" of December 1986 regarding such claim or regarding pressing, arbitrating or litigating it.
>
> Voluntarily assisting any person (not a governmental organ or entity) arbitrating or litigating a claim against the persons referred to in sec. 1 of the "Mutual Release of All Claims and Settlement Agreement" of December, 1986.

[Exhibit A, May 28 Order, p. 2, ¶ 6.] These particular prohibitions against Armstrong voluntarily assisting litigants and other claimants were based on paragraph 7G of the December, 1986 "Mutual Release of All Claims and Settlement Agreement" ("Settlement Agreement") referenced in the Order,[1] which this

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[1] Paragraph 7G of the Settlement Agreement states:

G. Plaintiff [Armstrong] agrees that he will not voluntarily assist or cooperate with any person adverse to Scientology in any proceeding against any of the Scientology organizations, individuals, or entities listed in Paragraph 1 above. Plaintiff also agrees that he will not cooperate in any manner with any organization aligned against Scientology. [Exhibit B, Settlement Agreement.]

Court found the Church held a reasonable probability of enforcing after trial. [Id., p. 1, ¶ 3.[2]]

Less than a month after the May 28 Order was issued, Armstrong asserted under oath in deposition that he would not honor its terms:[3]

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[2] As to the persons protected by this prohibition against assistance of adversaries, paragraph 1 of the Settlement Agreement states, in relevant part: ". . .the officers, agents, representative employees, volunteers, directors, successors, assigns, and legal counsel of [Church of Scientology International] as well as the Church of Scientology California, its officers, agents, representatives, employees, volunteers, directors, successors, assigned and legal counsel; Religious Technology Center, its officers, agents, representatives, employees, volunteers, directors, successors, assigns and legal counsel; all Scientology and Scientology affiliated organizations and entities and their officers, agents, representatives, employees, volunteers, directors, successors, assigns and legal counsel; L. Ron Hubbard, his heirs, beneficiaries, Estate and its executor; Author's Family Trust, its beneficiaries and its trustee; and Mary Sue Hubbard ..."

[3] Armstrong's intentional disregard for the court's orders in this case was also demonstrated by his actions subsequent to the March 5, 1992 issuance the temporary restraining order by Judge Dufficy of the Marin County Superior Court ("Armstrong TRO"). As the court's record shows, the Armstrong TRO restrained him, inter alia, from disclosing his experiences to third parties, including the press, as well as from assisting actual and prospective anti-Church litigants. However, through the March 12, 1992 deposition testimony in the matter of Hunziker, et al. v. Applied Materials, et al., Santa Clara County Superior Court No. 692629, Armstrong revealed that he was actively assisting the plaintiffs in that case in violation of the Armstrong TRO with negative materials on Scientology [Exhibit C, March 12 deposition of Gerald Armstrong in Hunziker, pp. 254-256, 323-330] and, in his October 7, 1992 deposition in the instant case, admitted that he had: (a) had discussions with Time Magazine reporter Richard Behar regarding the latter's litigation against the Church in the matter of Church of Scientology International v. Time Warner, Inc., Richard Behar, et al., U.S. District Court, Southern District of New York, No. 92 Civ. 3024(PKL); and (b) participated in the issuance of a press release critical of the Church and the Armstrong TRO on March 19, 1992. [Exhibit D, October 7, 1992 Deposition of Gerald Armstrong, pp. 338-339, 386-387; Exhibit E, press release.] As this Court's record also shows, on March 27, 1992, Judge Dufficy extended the Armstrong TRO to May 11, 1992. Nevertheless, Armstrong continued to violate that restraining

(continued...)

> I have absolutely no intention of honoring that settlement agreement. I cannot. I cannot logically. I cannot ethically. I cannot morally. I cannot psychically. I cannot philosophically. I cannot spiritually. I cannot in any way. And it is firmly my intention to not honor it.
>
> Q. No matter what a court says?
>
> A. No court can order it. They're going to have to kill me.

[Exhibit F, June 24, 1992 deposition of Gerald Armstrong, p. 124; Declaration of Laurie J. Bartilson, ¶ 4.[4]]

Armstrong's intention to ignore the May 28 Order was reiterated in a letter sent by Armstrong to plaintiff's counsel, dated December 22, 1992. [Exhibit G.] In that letter, which is copied to his own attorneys but not sent by them,[5] Armstrong threatens that, if he is not paid $500,000 and this lawsuit dismissed, he intends to travel voluntarily to South Africa to testify against a church of Scientology, give interviews to the media, and voluntarily assist anyone and everyone opposing Churches that he can locate. [Id., pp. 3, 4, 6, 7, 8.] Expressing

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[3](...continued) order, conducting post-extension hearing interviews with the press on March 27, 1992 (Don Knapp of CNN), in April, 1992 (William Horne of American Lawyer Magazine) and, possibly, with Behar. [Exhibit D, Armstrong Deposition, pp. 342-344, 348-355, 386-387.]

[4] Similarly, Armstrong has confirmed that he indicated to Los Angeles Times reporter Robert Welkos his, Armstrong's, intention not to comply with the May 28 Order. [Exhibit D, October 7, 1992 Armstrong Deposition, pp. 378-379; Declaration of Laurie J. Bartilson, ¶ 5.]

[5] In what can only be described as deliberate harassment, Armstrong also sent copies of the letter to 35 individuals and groups, including anti-Church litigants, such as Vicki and Richard Aznaran, Larry Wollersheim and Joseph Yanny, and lawyers who represent clients in actions brought against one of more churches, including Toby Plevin, John Elstead, and Dan Leipold.

the viewpoint that the May 28 Order places no restrictions whatsoever on his conduct, Armstrong states:

> I consider myself free to do anything anyone can, except testify absent a subpoena. Much of what I am permitted to do I am going to do. . . .
>
> I will continue to associate with and befriend all those people I consider you attack unjustly and senselessly. I will make my knowledge and support available to the Cult Awareness Network, a group of people of good will you vilify, in all the litigation you have fomented against them[6]. . . . I will even make my knowledge and support available to entities like Time and people like Rich Behar in their defenses from your attacks.[7]

[Exhibit G, p. 3.] In that same letter, Armstrong makes plain the personal contempt which he has for a Court which would rule against him:

> There is also, as mentioned above, the fact that in order to defend myself from your attacks and to fund the defense of the litigation you have fomented I must speak and must publish. I'm sure you understand that I remain completely confident that no court, other than the odd one your mercenaries are able to compromise with bucks, babes or bull, will order me not to defend myself.

[Id. p. 5].

B. Armstrong's Contemptuous Violation of The May 28 Order

Since the May 28 Order, Armstrong has defiantly aided at least six claimants and litigants that fall within the above quoted prohibitions. That provision of voluntary assistance has included the following:

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[6] The Cult Awareness Network is an anti-religious group that advocates the kidnapping and forcible "deprogramming" of individuals belonging to religions which they have identified as "cults." While the Church is not presently suing the Cult Awareness Network in any litigation, the president of the Cult Awareness Network, Cynthia Kisser, has initiated an action against the Church and its president, Heber Jentzsch. [Bartilson Dec., ¶ 17.]

[7] Behar is the author of a Time cover story concerning the Church which ran in May, 1991. The Church is presently engaged in a lawsuit against Time and Behar for defamation. [Bartilson Dec., ¶ 18]

1. Vicki and Richard Aznaran

As initially raised in the Church's February 4, 1992 preliminary injunction motion in this case, Armstrong continues to be employed as a paralegal at the law offices of his counsel Ford Greene. [Exhibit H, July 22, 1992 Deposition of Gerald Armstrong, pp. 186-189; Bartilson Dec., ¶ 6]; see also, February 4, 1992 Memorandum of Points and Authorities in Support of Plaintiff's Motion for Preliminary Injunction for Breach of Contract ("Injunction Memorandum"), pp. 2-3.

A central point raised in the Church's Injunction Memorandum was Armstrong's assistance via Ford Greene to anti-Church litigants Richard and Vicki Aznaran. Id. It came to Church counsel's attention in early July, 1992 that Mr. Greene, after a hiatus, was again representing the Aznarans in the matter of Vicki Aznaran and Richard Aznaran v. Church of Scientology International, et al., U.S. District Court, Central District of California No. CV-88-1786-JMI(Ex). Consequently, a letter was sent on July 7, 1992 seeking Armstrong's and Greene's undertaking that Armstrong would not violate the May 28 Order by Armstrong's assistance in the Aznarans' case. [Exhibit I, July 7, 1992 Bartilson letter; Bartilson Dec., ¶ 7.] In a July 11, 1992 response, Mr. Greene declined to make any such assurances.

[Exhibit J, July 11, 1992 Greene letter; Bartilson Dec., ¶ 8.[8]] However, as Greene's paralegal, Armstrong has, since Greene's July 11 letter, admitted to "broadly discussing" with the Aznarans matters concerning their case against the Church and has assisted in the relay of communications between the Aznarans and Greene. [Exhibit D, October 8 Armstrong Deposition, pp. 448-451.] [See also, Exhibit K, July 18, 1992 Bartilson letter documenting Armstrong's direct contact relating to the Aznaran case and requesting again that he cease and desist; Exhibit L, July 30, 1992 proofs of service executed by Armstrong in the Aznaran case; Bartilson Dec., ¶¶ 8-11.] While his counsel has raised work product and attorney-client communications objections to disclosing the content of Armstrong's communications with the Aznarans [see footnote 7 and Exhibit D, pp. 448-451; Exhibit J, Greene's July 11, 1992 letter], Armstrong's admissions of assistance are ample evidence of his knowing violation of the May 28 Order.

2. Tillie Good, Denise Cantin and Ed Roberts

Moreover, Armstrong has admitted providing assistance through Greene to three other potential litigants pursuing claims against Church entities that fall within the scope of the May 28

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[8] Mr. Greene's letter was an early indication of the manner in which he and Armstrong would attempt to avoid compliance with the May 28 Order, first disingenuously labelling it "somewhat cryptic and difficult to enforce" and then claiming that confirmation of whether or not Armstrong was violating that order as Greene's paralegal invaded Greene's clients' attorney work product and confidential communications privileges. Id. However, as shown by Armstrong's subsequent actions and admissions, there is no doubt that Armstrong has used his paralegal position in Mr. Greene's office to engage in repeated violations of the May 28 order.

Order: (a) Tillie Good; (b) Denise Cantin; and (c) Ed Roberts. [Exhibit D, October 8 Armstrong Deposition, pp. 451-458; Exhibit M, July 19, 1992 demand letter regarding Tillie Hanna Good; Exhibit N, July 2, 1992 demand letter regarding Denise Cantin; Exhibit O, September 4, 1992 demand letter regarding Ed Roberts; Bartilson Dec., ¶ 12.] While Mr. Greene again foreclosed inquiry into the specifics of Armstrong's assistance in these cases [Exhibit C at 451-458], Armstrong did admit that he had met with and interviewed Mr. Roberts concerning the latter's Church dispute and has spoken with him some seven times since then. [Id. at 455-457.]

Indeed, Armstrong's assistance to Mr. Roberts is apparently independent of any assistance which Armstrong provides to Mr. Greene. In his December 22 letter, Armstrong asserted that he "is the only person in the world willing to help Mr. Roberts against your organization." [Exhibit G, p. 7.] In that letter, Armstrong includes the payment of an unspecified amount to Mr. Roberts as a "condition" to the ending of Armstrong's campaign of harassment against the Church. [Id. p. 6-7.]

As with his assistance to the Aznarans, Armstrong's work with these three litigants violates the letter and intent of the May 28 Order.

3. Jerry Whitfield

In addition, the Church has just learned that Armstrong engaged in a lengthy videotaped interview on November 6, 1992 concerning his purported Church experiences with anti-Church litigant Jerry Whitfield and others. [Exhibit P, transcript of November 6, 1992 interview at convention of the Cult Awareness

Network; Exhibit Q, videotape thereof; Bartilson Dec., ¶ 21.] Whitfield, a self-proclaimed "specialist" in the "deprogramming" of Church of Scientology parishioners, is currently a defendant in a false imprisonment and false arrest suit brought by Church staff member Angel Casillas, Angel Casillas v. Jerry Whitfield, Hanna Whitfield and Does 1-25, Los Angeles Municipal Court Case No. 91K49349.

The November 6 interview -- in which Armstrong admits his actions are in violation of the May 28 order[9] -- demonstrates conclusively that Armstrong knowingly has chosen to disregard and flaunt the Preliminary Injunction issued by this Court. In supplying Whitfield with a video tape for Whitfield's use in forcible deprogrammings to force unwilling Scientologists to renounce their faith and for possible use in the Casillas case, Armstrong has once again directly and voluntarily supported an adverse litigant to the Church. Indeed, the making of the video tape by Armstrong at all is another deliberate violation or yet another provision of the Settlement Agreement itself, as well as a violation of the preliminary injunction. In Paragraph 6(D) of the Agreement, Armstrong agreed, inter alia,

> [N]ever to create or publish or attempt to publish, and/or assist another to create for publication by

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[9] While again proclaiming that he will never comply with the order, Armstrong acknowledges that the interview itself is in violation: "I cannot, except pursuant to a subpoena, assist someone intending to file a claim or pressing a claim against the organization. Now then we are appealing even that narrow ruling, because that's unenforceable because if you construe that my ... that this video could possibly indirectly help someone in the future, I can't do this. And not only that but if you consider that my existence indirectly or directly helps someone, then I'll oblige to take my own life. In other words I must stop breathing." Exhibit P, November 6 interview transcript, p. 31.

> means of magazine, article, book or other similar form, any writing or to broadcast of to assist another to create, write, film or video tape or audio tape any show, program or movie, or to grant interviews or discuss with others, concerning their experiences with the Church of Scientology, or concerning their personal or indirectly acquired knowledge or information concerning the Church of Scientology, L. Ron Hubbard or any of the organizations, individuals and entities listed in Paragraph 1 above. [Armstrong] further agrees that he will maintain strict confidentiality and silence with respect to his experiences with the Church of Scientology and any knowledge or information he may have concerning the Church of Scientology, L. Ron Hubbard, or any of the organizations, individuals and entities listed in Paragraph 1 above. . . .

Armstrong's production, with Whitfield, of a videotaped interview which purports to discuss both his and Whitfield's experiences with the Church, and which was created to be shown by Whitfield to victims he hopes to "deprogram" from the Scientology faith, despite the Agreement, despite the May 28 Order, and despite repeated notice from counsel for plaintiff that plaintiff intended to enforce both the Agreement and the May 28 Order demonstrate most eloquently the contempt which Armstrong has for the legal process, plaintiff's rights, and this Court. His defiance is not accidental or a minor misstep: it is deliberate, flagrant, defiant contempt. If ever a case cried out for the issuance of an order to show cause, this is that case.

III.

DISCUSSION

The Church seeks an order to show cause why Armstrong should not be held in criminal contempt of the May 28 Order.[10] As embodied in Code of Civil Procedure § 1209 et seq., the Court has the power to punish acts, such as Armstrong's, which impede and obstruct the discharge of its duties. See, Morelli v. Superior Court (1969) 1 Cal.3d 328, 333, 82 Cal.Rptr. 375 (criminal contempt proceedings arising out of a civil action are aimed at the vindication of the authority of the court).

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[10] The Church does not seek a civil contempt of the May 28 Order as coercive confinement would, at best, result in Armstrong's "promise" not to violate that order, clearly a meaningless act in light of Armstrong's demonstrable lack of (continued...)

Violations of court orders constitute contempt. This Court has inherent power to enforce execution of its equity decrees. Brown v. Brown (1971) 22 Cal.App.3d 82, 84, 99 Cal.Rptr. 311 (same). Moreover, Code of Civil Procedure § 1209(a) specifically provides, in relevant part:

> [T]he following acts or omissions in respect to a court of justice, or proceedings therein, are contempts of the authority of the court:
>
> . . .
>
> 5. Disobedience of any lawful . . . order . . . of the court.

See also, Reliable Enterprises, Inc. v. Superior Court (1984) 158 Cal.App.3d 604, 204 Cal.Rptr. 786 (criminal contempt adjudication for violation of preliminary injunction upheld); Pacific Telephone and Telegraph Co. v. Superior Court (1968) 265 Cal.App.2d 370, 72 Cal.Rptr. 177 (Section 1209 contempt proceedings are special proceedings, criminal in character and intended to implement the inherent power of the court to enforce its lawful orders); Vanderstok v. Bank of America (1972) 29 Cal.App.3d 731, 734, 105 Cal.Rptr. 699 (contempt proceeding is a proper process for enforcement of an injunction order).

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[10] (...continued) credibility on undertakings to honor his agreements.

In order to establish such an indirect contempt committed out of the immediate presence of the court, the moving party must demonstrate by sworn statement facts constituting the violation of the court's order. Code of Civil Procedure § 1211. The moving party's affidavit or declaration "need only make a prima* facie showing of the elements of contempt. Those elements are that the court made a lawful order; the person cited for contempt had knowledge or notice of the order; and the person was able to comply, yet willfully disobeyed the order." Crawford v. W.C.A.B.. (1989) 213 Cal.App.3d 156, 169, 259 Cal.Rptr. 414, 422-423.

The Church, through the accompanying declaration of Laurie J. Bartilson, has met each of these requirements. Present at the depositions in which Armstrong made the admissions specified in Section II, supra, the recipient of the phone call and proofs of service Armstrong effected in aid of the Aznaran's case, and the recipient of Armstrong's December 22 letter, Ms. Bartilson establishes through her declaration: (a) Issuance of the valid May 28 Order; (b) Notice to Armstrong of the May 28 Order (through notice to his attorneys, in the manner authorized by the Court, on June 5, 1992) [Bartilson Dec., ¶ 3 and Exhibit S]; (c) Armstrong's knowledge of the May 28 Order (through his statements that he was aware of but would never comply with such order) [Bartilson Dec., ¶¶ 4, 5, 9, 10 and 13]; (d) Armstrong's ability to have complied with such order (through his actions of assistance to anti-Church litigants, Armstrong is just as able to desist from such actions) [Bartilson Dec., ¶¶ 4, 5, 9, 11, 12 and 13]; and (e) Armstrong's willful disobedience of the subject order (through his refusal to cease and desist from the prohibited assistance after direct notice and demand by Church counsel) [Bartilson Dec., ¶¶ 4, 5, 9, 11, 12, 13 and 14.]

Accordingly, Armstrong should be ordered to Show Cause why he should not be held in criminal contempt of this Court, with punishment in the form of fine not to exceed $1,000.00 and jail time not to exceed five days as this Court sees fit. Code of Civil Procedure § 1218. The Court should exercise all of its available powers to impress upon Armstrong that its orders mean what they say and will be enforced, despite the intransigence of an enjoined party. Indeed, incarceration is an unusually viable vehicle for impressing upon Armstrong the import of his obligations, inasmuch as Armstrong has publicly disavowed money as a meaningful or valuable commodity. [Exhibit R.] Moreover, with Armstrong expressing his "to the grave" defiance of the May 28 Order, the Church submits that upon a finding of contempt under Code of Civil Procedure § 1209, _et seq._, referral to the District Attorney for misdemeanor prosecution under Penal Code § 166(4) is also appropriate to address such a defiant, willful challenge to the Court's authority.

IV.

CONCLUSION

For the foregoing reasons, plaintiff Church respectfully requests that the Court order that Armstrong show cause why he should not be held in contempt of court and why plaintiff Church

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should not be awarded its costs, including attorneys' fees, in bringing this motion.

Dated: December 31, 1992

Respectfully submitted,

Andrew H. Wilson
WILSON, RYAN & CAMPILONGO

BOWLES & MOXON

By:
Laurie J. Bartilson

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; DOES 1 through 25, inclusive, Defendants.	CASE NO. BC 052395 DECLARATION OF LAURIE J. BARTILSON IN SUPPORT OF APPLICATION FOR ORDER TO SHOW CAUSE WHY GERALD ARMSTRONG SHOULD NOT BE HELD IN CONTEMPT DATE: December 31, 1992 TIME: 1:30 p.m. DEPT: 88 DISCOVERY CUT-OFF: None MOTION CUT-OFF: None TRIAL DATE: May 3, 1992

I, LAURIE J. BARTILSON, hereby declare:

1. I am a member of the law firm of Bowles & Moxon and am an attorney admitted to practice in the State of California. My firm represents plaintiff Church of Scientology International ("Church") in the instant case. I am submitting this declaration in support of the Church's Motion for Order to Show Cause Why Gerald Armstrong Should Not Be Held in Contempt ("Motion") and

said Motion's accompanying memorandum of points and authorities ("Memorandum"). I have personal knowledge of the matters specified in this declaration and, if called upon to testify on such matters, would and could do so competently.

2. On May 28, 1992, this Court issued a preliminary injunction order ("May 28 Order") in this case which stated, in relevant part:

> Defendant Gerald Armstrong, his agents, and persons acting in concert or conspiracy with him (excluding attorneys at law who are not said defendant's agents or retained by him) are restrained and enjoined during the pendency of this suit pending further order of this court from doing directly or indirectly any of the following:
>
> Voluntarily assisting any person (not a governmental organ or entity) intending to make, intending to press, intending to arbitrate, or intending to litigate a claim against the persons referred to in sec. 1. of the "Mutual Release of All Claims and Settlement Agreement" of December 1986 regarding such claim or regarding pressing, arbitrating or litigating it.
>
> Voluntarily assisting any person (not a governmental organ or entity) arbitrating or litigating a claim against the persons referred to in sec. 1 of the "Mutual Release of All Claims and Settlement Agreement" of December, 1986.

A true and correct copy of the May 28 Order which I received from the Court is attached as Exhibit A in support of the Motion.

3. On June 5, 1992, I gave notice to Armstrong's lawyers, Ford Greene and Paul Morantz, of the May 28 Order. A true and correct copy of the Notice with exhibits and proofs of service is attached as Exhibit S in support of the Motion.

4. At a deposition of Gerald Armstrong ("Armstrong") in this case on June 24, 1992, he and my co-counsel, Andrew Wilson, had the following exchange regarding the December 1986 "Mutual

Release and Settlement Agreement" between the Church and Armstrong ("Settlement Agreement") and the May 28 Order:

> A. . . . I have absolutely no intention of honoring that settlement agreement. I cannot. I cannot logically. I cannot ethically. I cannot morally. I cannot psychically. I cannot philosophically. I cannot spiritually. I cannot in any way. And it is firmly my intention to not honor it.
>
> Q. No matter what a court says?
>
> A. No court can order it. They're going to have to kill me.

A true and correct copy of the relevant page of the transcript of that deposition, p. 124, accurately reflecting the statements of Armstrong and myself, is attached as Exhibit F to the Motion.

5. At a continuation of Armstrong's deposition in this case on October 7, 1992, Armstrong and I had the following exchange regarding the May 28 Order:

> Q. When was the next time you spoke to Mr. Welkos or Mr. Sappell?
>
> A. Around the time of the Sohigian ruling.
>
> Q. This is another telephone conversation?
>
> A. In that I only met Mr. Welkos on that one occasion, yes.
>
> Q. I apologize. You said that, and I forgot. And this was a conversation with Mr. Welkos?
>
> A. Yes
>
> Q. Did you call him, or did he call you?
>
> A. I believe I originated the conversation.
>
> Q. What did he say to you, and what did you say to him, during that conversation?
>
> A. I believe I advised him of the Sohigian ruling.

> Q. Did you discuss anything else with him?
>
> A. I think it was -- That's all that I recall being the subject of the discussion at that time.
>
> Q. Did you tell him that as a result of the Sohigian ruling, you now felt that you were more free to do things that you had been constrained about doing before?
>
> A. No, I never said that. Because I did not feel I was constrained before. But rather that by specifically denying the injunction as to all of those things which the organization sought in the preliminary injunction, that I was free from the potential of an injunction.

A true and correct copy of the relevant pages of the transcript of that deposition, pp. 378-379, accurately reflecting the statements of Armstrong and myself, is attached as part of Exhibit D to the Motion. On behalf of my client the Church, I allege that the statements made by Armstrong under oath as quoted in this paragraph and the paragraph immediately preceding in this declaration are acknowledgements by Armstrong of his awareness of the May 28 Order, his ability to act in compliance of such order and his intention to wilfully disobey its terms.

6. At a continuation of Armstrong's deposition in this case on July 22, 1992, he acknowledged to me under oath that he continued to be employed by Ford Greene as a paralegal. A true and correct copy of the relevant pages of the transcript of that deposition, pp. 186-189, accurately reflecting the statements of Armstrong and myself, is attached as Exhibit H to the Motion.

7. On July 7, 1992, I received in the mail a notice of association from Ford Greene announcing that he again represented Vicki and Richard Aznaran in the matter of Vicki Aznaran and Richard Aznaran v. Church of Scientology International, et al.

U.S. District Court, Central District of California No. CV-88-1786-JMI(Ex) ("Aznaran v. Church"). On that day, I sent Mr. Greene a letter by telecopier and first class mail. A true and correct copy of that letter is attached as Exhibit I to the Motion. In that letter, I requested that Mr. Greene inform me of the steps that had been and that would be taken to ensure that Armstrong did not violate the terms of the May 28 Order, in particular the prohibition that prevented Armstrong from assisting the Aznarans in their case.

8. On or about July 12, 1992, I received a letter from Mr. Greene, dated July 11, 1992, which responded to the above referenced letter of July 7, 1992. A true and correct copy of that letter is attached as Exhibit J to the Motion. In that letter, Mr. Greene pointedly declined to provide any specific assurances that Armstrong would not assist the Aznarans or any other anti-Church litigant or claimant in violation of the above-cited terms of the May 28 Order. Instead, he characterized the May 28 Order as "somewhat cryptic and difficult to enforce" and that as to Armstrong's compliance with said order, I "would simply have to take [Mr. Greene's] word for it."

9. In July, 1992, following my receipt of a copy of a ruling of Judge Ideman in Aznaran v. Church transferring that case from the Central District of California to the U.S. District Court in Dallas, Texas, I received a telephone call from Armstrong in which he stated that he was calling from Mr. Greene's office and that he needed to receive immediately by fax such transfer ruling of Judge Ideman. I told Armstrong that the May 28 Order prohibited him from assisting the Aznarans or any

other litigants against the Church. He replied that he was trying to help the Aznarans. On behalf of my client the Church, I allege that the statements made by Armstrong as relayed in this paragraph are acknowledgements by Armstrong of his awareness of the May 28 Order, his ability to act in compliance of such order and his intention to wilfully disobey its terms.

10. On July 18, 1992, I sent another letter to Mr. Greene by telecopier and first class mail, responding to his July 11, 1992 letter, accurately describing my above referenced July, 1992 conversation with Armstrong and reiterating that Armstrong was required to immediately cease all work for the Aznarans and to cease all actions in violation of the May 28 Order. A true and correct copy of that letter is attached as Exhibit K to the Motion.

11. I received no response to my July 18, 1992 letter from Mr. Greene. However, on or about August 1, 1992, I received two proofs of service for Mr. Greene's pleadings in the Aznaran v. Church case, each of which was executed by Armstrong. True and correct copies of those proofs of service are attached as Exhibit L to the Motion. On behalf of my client the Church, I allege that the actions taken by Armstrong as relayed in this paragraph are acknowledgements by Armstrong of his ability to act in compliance of the May 28 Order and his intention to wilfully disobey its terms.

12. In the continuation of Armstrong's deposition in this case on October 7 and 8, 1992, during which I further examined Armstrong, he made several additional admissions that I allege indicate his awareness of the May 28 Order, his ability to act in

compliance of such order and his intention to wilfully disobey its terms. These admissions include Armstrong's statements that he broadly discussed with the Aznarans matters relating to their case against the Church, that he assisted in the relay of communications between the Aznarans and Mr. Greene and that he was assisting three other persons, Tillie Good, Denise Cantin and Ed Roberts, each of whom is making claims, through Mr. Greene's office, against Churches of Scientology protected by the May 28 Order. A true and correct copy of the relevant pages of the transcript of this deposition, pp. 448-458, accurately reflecting the statements of Armstrong, Mr. Greene and myself, is attached as part of Exhibit D to the Motion. True and correct copies of Mr. Greene's demand letters against various Churches of Scientology on behalf of Ms. Good, Ms. Cantin and Mr. Roberts received by me and/or my firm are attached as Exhibits M, N and O respectively to the Motion.

13. On December 26, 1992, I received by U.S. mail a letter signed by Gerald Armstrong, dated December 22, 1992, and addressed to "David Miscavige and all other individuals who participate in the control of Scientology, C/O Laurie J. Bartilson, Esquire" ("December 22 Letter"). A true and correct copy of the December 22 Letter is attached to the moving papers as Exhibit G.

14. In what can only be described as deliberate harassment, Armstrong also sent copies of the letter to 35 individuals and groups, including anti-Church litigants, such as Vicki and Richard Aznaran, Larry Wollersheim and Joseph Yanny, and lawyers who represent clients in actions brought against one of more

churches, including Toby Plevin, John Elstead, and Dan Leipold.

15. Armstrong spends the bulk of the December 22 Letter vilifying the Church and its members, and threatening further breaches of the settlement agreement, and violations of the preliminary injunction, if his demands are not met. Although Armstrong has publicly disavowed any interest in money, he insists that the Church pay him $500,000 for his "legal fees and costs," "cancel" the settlement agreement, and pay unspecified amounts of money to other anti-Church litigants if the Church wishes to avoid Armstrong's threatened violations.

16. Specifically, Armstrong threatens that, if his demands are not met, that he will travel voluntarily to South Africa to testify against a church of Scientology, give interviews to the media, and voluntarily assist anyone and everyone opposing Churches that he can locate. [Id. pp. 3, 4, 6, 7, 8] Expressing the viewpoint that the May 28 Order places no restrictions whatsoever on his conduct, Armstrong states,

> I consider myself free to do anything anyone can, except testify absent a subpoena. Much of what I am permitted to do I am going to do. . . .
>
> I will continue to associate with and befriend all those people I consider you attack unjustly and senselessly. I will make my knowledge and support available to the Cult Awareness Network, a group of people of good will you vilify, in all the litigation you have fomented against them. . . . I will even make my knowledge and support available to entities like Time and people like Rich Behar in their defenses from your attacks.

[Exhibit G, p. 3].

17. The Cult Awareness Network is an anti-religious group that advocates the kidnapping and forcible "deprogramming" of individuals belonging to religions which they have identified as

"cults." While the Church is not presently suing the Cult Awareness Network in any litigation, the president of the Cult Awareness Network, Cynthia Kisser, has initiated an action against the Church and its president, Heber Jentzsch.

18. Richard Behar is the author of a Time cover story concerning the Church which ran in May, 1991. The Church is presently engaged in a lawsuit against Time and Behar for defamation.

19. In the December 22 Letter, Armstrong also makes plain the personal contempt which he has for a Court which would rule against him:

> There is also, as mentioned above, the fact that in order to defend myself from your attacks and to fund the defense of the litigation you have fomented I must speak and must publish. I'm sure you understand that I remain completely confident that no court, other than the odd one your mercenaries are able to compromise with bucks, babes or bull, will order me not to defend myself.

[Id. p. 5].

20. These recent pronouncements by Armstrong make plain that nothing short of a criminal contempt order is likely to end Armstrong's misconduct.

21. On December 30, 1992, I received a videotape identified by the initial speaker as a November 6, 1992 interview of Armstrong. Jerry Whitfield and others participated in such interview which, on information and belief, took place at the Los Angeles convention in early November, 1992 of the so-called "Cult Awareness Network" ("CAN"). A true and accurate copy of the video tape is attached and lodged as Exhibit Q to the Motion. A true and accurate transcript of the conversation between

Armstrong, Mr. Whitfield and others as reflected on said videotape is attached as Exhibit P to the Motion. During this recorded interview, Armstrong makes the following statement:

> . . . I cannot, except pursuant to a subpoena, assist someone intending to file a claim or pressing a claim against the organization. Now then we are appealing even that narrow ruling, because that's unenforceable because if you construe that my ... that this video could possibly indirectly help someone in the future, I can't do this. And not only that but if you consider that my existence indirectly or directly helps someone, then I'll oblige to take my own life. In other words, I must stop breathing. It's unenforceable. I feel I am completely at liberty to associate with whomever I want, to talk to whomever I want, and I act and live that way. And that is in part why I am here at this event now, why I came to the CAN conference.

Exhibit P, p. 34.

On behalf of my client the Church, I allege that the statements made by Armstrong as relayed in this paragraph are further acknowledgements by Armstrong of his awareness of the May 28 Order, his ability to act in compliance of such order and his intention to wilfully disobey its terms.

22. Mr. Whitfield is a defendant in the matter of Casillas v. Jerry Whitfield, et al., Los Angeles County Municipal Court No. 91K49349. My office represents Mr. Casillas in that action. Mr. Casillas is a staff member of the Church and is suing Mr. Whitfield and others for false imprisonment and false arrest.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 31st day of December, 1992 at Los Angeles, California.

H:\ARMSTRON\BART.DEC

Laurie J. Bartilson

DEPT. 88

SUPERIOR COURT OF CALIFORNIA , COUNTY OF LOS ANGELES

: May 28, 1992
rable Ronald M. Sohigian, Judge

M. Cervantes, Deputy Clerk
None (E.R.M.)

052395

(Parties and Counsel checked if pre:

ırch of Scientology, International

Counsel For
Plaintiff

s.

rald Armstrong, et al.

Counsel For
Defendant

No Appearances

NATURE OF PROCEEDINGS: RULING ON MATTER TAKEN UNDER SUBMISSION ON MAY 27, 1992

In this matter heretofore taken under submission on May 27, 1992, the court now makes the following ruling.

1 Plaintiff's legal remedies are inadequate insofar as the scope of relief ordered below is concerned, but not otherwise. CCP 526(4) and (5).

2 The threatened acts which are restrained by the order referred to below, but only those threatened acts, would do irreparable harm to plaintiff which could not be compensated by monetary damages. CCP 526(2).

3 On the basis of the instant record, there is a reasonable probability that plaintiff will prevail after trial of this case in the respects restrained by this order. CCP 526(1); cf., San Francisco Newspaper Printing Co., Inc. vs. Superior Court (Miller) (1985) 170 Cal. App. 3d 438.

4 Plaintiff is likely to suffer greater injury from denial of the preliminary injunction the terms of which are set out below than the injury which defendant is likely to suffer if it is granted. See Robbins vs. Superior Court (County of Sacramento) (1985) 38 Cal. 3d 199, 206.

5 The granting of a preliminary injunction in the terms set out below will preserve the status quo pending trial.

DEPT. 88

SUPERIOR COURT OF CALIFORNIA , COUNTY OF LOS ANGELES

e: May 28, 1992
orable Ronald M. Sohigian, Judge

M. Cervantes, Deputy Clerk
None (E.R.M.)

052395 (Parties and Counsel checked if present)

urch of Scientology, International

Counsel For Plaintiff

s.

rald Armstrong, et al.

Counsel For Defendant

No Appearances

NATURE OF PROCEEDINGS: RULING ON MATTER TAKEN UNDER SUBMISSION ON MAY 27, 1992

6 Application for preliminary injunction is granted in part, in the following respects only.

Defendant Gerald Armstrong, his agents, and persons acting in concert or conspiracy with him (excluding attorneys at law who are not said defendant's agents or retained by him) are restrained and enjoined during the pendency of this suit pending further order of court from doing directly or indirectly any of the following:

Voluntarily assisting any person (not a governmental organ or entity) intending to make, intending to press, intending to arbitrate, or intending to litigate a claim against the persons referred to in sec. 1 of the "Mutual Release of All Claims and Settlement Agreement" of December, 1986 regarding such claim or regarding pressing, arbitrating, or litigating it.

Voluntarily assisting any person (not a governmental organ or entity) arbitrating or litigating a claim against the persons referred to in sec. 1 of the "Mutual Release of All Claims and Settlement Agreement" of December, 1986.

The court does not intend by the foregoing to prohibit defendant Armstrong from: (a) being reasonably available for the service of subpoenas on him; (b) accepting service of subpoenas on him without physical resistance, obstructive tactics, or flight; (c) testifying fully and fairly in response to properly put questions either in deposition, at trial, or in other legal or arbitration proceedings; (d) properly reporting or disclosing to authorities criminal conduct of the persons referred to in sec. 1 of the "Mutual Release of All Claims and Settlement Agreement" of December, 1986; or (e) engaging in gainful employment rendering clerical or paralegal services not contrary to the terms and conditions of this order.

DEPT. 88

SUPERIOR COURT OF CALIFORNIA , COUNTY OF LOS ANGELES

: May 28, 1992
able Ronald M. Sohigian, Judge

M. Cervantes, Deputy Clerk
None (E.R.M.)

052395

(Parties and Counsel checked if present)

rch of Scientology, International

Counsel For
Plaintiff

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ald Armstrong, et al.

Counsel For
Defendant

No Appearances

NATURE OF PROCEEDINGS: RULING ON MATTER TAKEN UNDER SUBMISSION ON MAY 27, 1992

The application for preliminary injunction is otherwise denied.

7 The restraints referred to in sec. 6, above, will become effective upon plaintiff's posting an undertaking in the sum of $70,000 pursuant to CCP 529(a) by 12:00 noon on June 5, 1992.

8 The restraints referred to in sec. 6, above, properly balance and accommodate the policies inherent in: (a) the protectable interests of the parties to this suit; (b) the protectable interests of the public at large; (c) the goal of attaining full and impartial justice through legitimate and properly informed civil and criminal judicial proceedings and arbitrations; (d) the gravity of interest involved in what the record demonstrates defendant might communicate in derogation of the contractual language; and (e) the reasonable interpretation of the "Mutual Release of All Claims and Settlement Agreement" of December, 1986. The fair interpretation of all the cases cited by the parties indicates that this is the correct decisional process. The law appropriately favors settlement agreements. Obviously, one limitation on freedom of contract is "public policy"; in determining what the scope of the public policy limitation on the parties' rights to enforcement of their agreement in the specific factual context of this case, the court has weighed the factors referred to in the first sentence of this section. Litigants have a substantial range of contractual freedom, even to the extent of agreeing not to assert or exercise rights which they might otherwise have. The instant record shows that plaintiff was substantially compensated as an aspect of the agreement, and does not persuasively support defendant's claim of duress or that the issues involved in this preliminary injunction proceeding were precluded by any prior decision.

DEPT. 88

SUPERIOR COURT OF CALIFORNIA , COUNTY OF LOS ANGELES

: May 28, 1992
rable **Ronald M. Sohigian**, Judge

M. Cervantes, Deputy Clerk
None (E.R.M.)

052395 (Parties and Counsel checked if present)

rch of Scientology, International

Counsel For Plaintiff

s.

rald Armstrong, et al.

Counsel For Defendant

No Appearances

NATURE OF PROCEEDINGS: RULING ON MATTER TAKEN UNDER SUBMISSION ON MAY 27, 1992

9 The court does not dispositively decide the underlying merits of the case except for this preliminary determination. CCP 526(1); aypoint Mortgage Corp. vs. Crest Premium Real Estate etc. Trust (1985) 68 Cal. App. 3d 818, 823.

10 Plaintiff is ordered give written notice by mail by June 5, 1992, including in that written notice a statement regarding whether plaintiff has or has not posted the undertaking referred to in sec. 7, above, and attaching to that written notice evidence showing that the undertaking has been posted if that is the fact.

DATED: May 28, 1992.

RONALD M. SOHIGIAN

RONALD M. SOHIGIAN
Judge of the Superior Court

A copy of this minute order is sent to counsel via United States mail this date.

7154

December 22, 1992

David Miscavige and all other individuals who participate in the control of Scientology
C/O Laurie J. Bartilson, Esquire
Bowles & Moxon
6255 Sunset Blvd., Suite 2000
Los Angeles, CA 90028

Re: Nothling v. Scientology

Dear David and all others involved:

I am writing this to you, and the various copy recipients listed below, because there are certain things it is fair that you know. Although it is the trial in the Nothling case, which, I understand, is set for early February, that has moved me to write at this time, the idea of writing has made addressing a number of other subjects also timely.

You will recall that in June of 1991 when Malcolm Nothling called me and asked me to testify in his case in Johannesburg I wrote to the organization via Eric Lieberman to see if by initiating communication on the subject you might see that there was an answer to your litigation problems different from the one you and your erstwhile leader had been believing in and pursuing as long as any of us can remember.

Mr. Lieberman wrote back, essentially advising me you said stick it in my ear, and that more, not less litigation was going to be the same old solution; and to not expect communication other than the solidest of sorts. Copies of Mr. Lieberman's and my letters are enclosed herewith.

I did travel to South Africa in 1991 to testify, as you know, but the trial was postponed on the organization's motion. Now it's set to happen again. Again Mr. Nothling has asked me to testify, again I have agreed, and again I am writing you to see if there is any sense in attempting to unfoment this litigation.

Your public attack line that Gerald Armstrong foments litigation against you is particularly hurtful because of what I have done and continue to do to unfoment litigation. Even my signing of your settlement agreement was, in the face of your intent to hurt me, which fact is settled by the agreement itself, an act only of unfomentation.

You all should take a good hard look at the hurt your practices, certainly your litigation practices, cause in the world. And you don't have to desist in them because of anything I've said. You can knock off those bad practices for any reason you want, including because they don't work and make no sense.

All the decent people, believe me, in your organization want you to get out of the stupid attack-the-attacker business, and they'd salute you for getting the organization out of that silliness, but they're too frightened. You shouldn't frighten good people that way. It's cruel. And any thinking soul knows that you guys are only acting out of fear, so you really are not fooling anyone with your blindness and bluster.

I realize you've put your faith in really bad things, like lies and PR, threats and bullying, and really mean people, like Gene Ingram. And I'm aware that having put your faith in badness for so long, and spent so many millions of dollars to have so many bad lawyers make so many bad decisions and add so much to their brethren's bad name, it can seem impossible to quit. But you must. All it will take is the willingness to unfoment your litigation.

Eugene M. Ingram has done such nasty things to so many people in the service of your organization, you and he should be spanked. His terrible charge at the CAN convention that I have AIDS is heartbreaking, not because I have AIDS, which I don't, but because your pet pit viper personalizes and focuses your organization's institutionalized hatred.

By accusing me of having AIDS, you and Ingram attack not just me, you attack the many people whose lives have been touched by this disease, or for that matter touched by your organization, and you attack yourself. Your similar-veined attacks on other people of good will at the CAN conference, like Father Kent Burtner, has brought your organization to ignomy.

But the target of faith can be rechosen. And that is where I urge sense and unfomentation. Put your faith in what is real, what is true, what can always be depended on. Put your faith in what in people is true, unchanging and ceaselessly loving. Putting your faith in lies, PR, threats, bullying and bullies you will always betray yourself because you put your faith in nothing; and you and every being everywhere have a right to everything that nothing isn't.

Likewise don't put your faith in litigation or your use of the courts to harass. It is possible to be faithful to a higher ideal than wins in court. If you have put your faith in lies, leverage, advantage and bullying to secure a win, you have gained nothing. If you put your faith in truth, hope, charity, love, no matter the courtroom outcome you have everything; that's religion.

Since the 1991 almost trial in the Nothling case the California Court of Appeal issued its opinion in the appeal you took from the Breckenridge decision in Armstrong I, the California Supreme Court denied review, and the Court of Appeal denied your motion to seal the appellate record. You brought and lost the motion to enforce the settlement agreement before Judge Geernaert in Armstrong I, and then you sued me to enforce it in Armstrong II.

In May Judge Sohigian issued his ruling refusing to enforce the agreement, although enjoining me from testifying unless pursuant to a subpoena. He also ruled that I did not have to not make myself amenable to service of process. I will supply a copy of the Breckenridge decision, the Armstrong opinion and the Sohigian injunction to any of the recipients of this letter upon request.

Because you didn't appeal from the Sohigian injunction, you have accepted it. I believe as well that for a valueless desire for a valueless win at any cost you also accepted his dicta; e.g. "involves abusing people who are weak," "involves techniques of coercion," "a very, very substantial deviation between [your] conduct and standards of ordinary, courteous conduct and standards of ordinary, honest behavior," "be sure you cut the deck," "make sure to count all the chips."

As a result, I consider myself free to do anything anyone can, except testify absent a subpoena. Much of what I am permitted do I am going to do. I am going to write freely, speak freely, publish, talk to the media, associate freely, and continue, until you put your faith in something more religious than what is bad in jurisprudence, to confront the injustice you bring to court.

In the next month or so I expect to initiate speaking or media events to help pay the enormous costs of this litigation. And I expect to promote my legal position within the publishing industry, because my story and my writings on the subject are literarily and commercially worthy.

I will continue to associate with and befriend all those people I consider you attack unjustly and senselessly. I will make my knowledge and support available to the Cult Awareness Network, a group of people of good will you vilify, in all the litigation you have fomented against them. I will make my knowledge and support available to any Scientologist who is afraid to go anywhere else for understanding, and to the families of Scientologists your organization has estranged. I will even make my knowledge and support available to entities like Time and people like Rich Behar in their defenses from your attacks.

I will, nevertheless, remain available to do whatever I can to unfoment your litigation. I will meet with you, talk with you, help you to find a better solution to your problems. Because of your decision to not have anyone communicate with me, no one from your organization has. I get a little lawyer contact, lots of PI BS, an OSA hearing or deposition attender, enough psychic skirmishes for an army, but, for the life of me, no real people.

In 1991, fantastically, I was the only person in the world, other than Malcolm Nothling himself, who was willing to testify at his trial. And that was enough reason to go. In February 1993, although at this trial I probably won't be the only person willing to testify, there will still be ample reasons to go, unless the case can be resolved.

I really would rather there was no trial and I really would rather not go. Lord knows this last period has been overwhelming and the litigation behemoth terrifying; and Lord knows I have my own calling, which has nothing to do with your legal problems. So I'm willing to do a lot to unfoment the Nothling litigation, and all the tangled legal webs you've woven. But I sure can't do much if you continue to see legal warfare as the solution to your problems and continue to pay the millions your legal mercenaries say the warfare costs.

I am aware that with enough money to enough lawyers you, the leaders of your organization, can hide yourselves and make your roles in your trumped-up war seem very important. There is no doubt this is desirable, it just isn't fair. The real purpose of your little war is to facilitate your doing something different from Scientology, while all those whom you control must go through the daily grind you say you're above.

I don't fault you for doing something different from Scientology, but I do not find acceptable your holding Scientologists in bondage to your catastrophic cause, enforcing your lie that you have their best interests in mind, robbing their years of youth and vigor, and putting them at risk while you show up at the occasional ribbon cutting ceremony, lunch with lawyers and the like, sucker celebs, run PIs and intel ops, conspire, cheat, lie, steal, bully and destroy. I urge something more creative as a better idea.

Your hardworking staff members and people of good will around the world who have supported you financially and spiritually will not for much longer be fooled by your foolishness and will stop believing your lies. They will speak to each other, they will speak out against your suppression, and they will act to free themselves and their friends. You cannot much longer, as we move societally into the age of wisdom, cynically and sillily intimidate good people with threat and suppress good people with lies.

There is the matter of mitigation of damages which, because you insist your lawyers tell you what you pay them to say, you may not have heard or yet understood. In that by the Sohigian ruling I am permitted to speak freely, write freely, publish freely, associate freely, when, it could be argued, and you have, that prior to the ruling and pursuant to the settlement agreement I was not so permitted, I have, in your attempt to enforce the agreement, prevailed.

By not appealing the Sohigian ruling you have acquiesced thereto. I am therefore due costs and fees in Armstrong II plus the costs and fees you already owe in your earlier losing and unappealed effort in Armstrong I. But in addition to the fees and costs now owing, and increasing as you protract this already lost litigation, there is the cumulative effect of your legal onslaught which, continuing after the case was lost, if not before, is in every minute malicious.

Gerald Armstrong and The Gerald Armstrong Corporation (TGAC) must also mitigate their damages. I have a duty, therefore, to end this litigation as quickly as possible. Thus I write to so many organizational recipients; thus I canvass to see if within the organization's many parts, all put at risk by their leaders' asininity and mean-spiritedness, there are people of good will who will see sense in what is in their best interest.

That after the Sohigian ruling you sued TGAC (pronounce that Tee-Gee-Ack) is silly and self-destructive. The only thing in the world Gerald Armstrong, individual, is prohibited from doing by the "injunction," is testifying about his Scientology history and knowledge without first accepting the perfunctory subpoena. TGAC only came into existence in 1987, six years after Gerald Armstrong's organization experiences ended, and a year after the Armstrong I litigation "settled."

TGAC cannot testify, with or without subpoena, about any Scientology experiences, because it has had, aside from those which have flowed from your lawsuit, none. Since no one, including TGAC, is prohibited by Sohigian from doing any of the things TGAC actually is capable of doing, it is free to do everything anyone or any other corporation can; and by not appealing the injunction you have so agreed. Thus, having no conceivably legitimate claim against TGAC, you depend on one manufactured from madness, and you must therefore dismiss the mess you've made.

There is also, as mentioned above, the fact that in order to defend myself from your attacks and to fund the defense of the litigation you have fomented I must speak and must publish. I'm sure you understand that I remain completely confident that no court, other than the odd one your mercenaries are able to compromise with bucks, babes or bull, will order me to not defend myself.

I realize you will probably claim to be offended by everything I've written in this letter. I can't do much about that because you seem to take offense no matter what I say or write, or don't. For, *inter alia*, that reason I haven't said or written it differently. I really don't blame you for being offended and I don't expect you not to be offended; nor will I be offended if you are. I think my position is obvious and I think peace is worth doing something about, even if the fomenters of war are offended. I've used the words I've used because to me they make sense and they're a facet of my craft.

This letter is not really, however you may take it, a complaint nor an attack. It is an effort to unfoment your litigation, into which I have been, albeit for some God-given purpose, drawn. So, neither forgetting nor ignoring Judge Sohigian's admonition not to settle Armstrong II, but still hoping, with my heart crossed, here is my proposal:

1. Settle the Nothling case;
2. Settle with Ed Roberts;
3. Dismiss your complaint against TGAC and Gerald Armstrong;
4. Remove all your bar complaints against Ford Greene;
5. Pay my attorney fees and costs;
6. We will dismiss the cross-complaint and appeal;
7. Cancel the agreement;
8. Return all materials you've stolen from me at any time;
9. Pay me whatever you want, including, but not limited to, nothing.

1. Malcolm Nothling has a claim and he has survived a lot to get to trial. His costs, not much by US litigation standards, must be recognized, and he must be made whole financially, ethically and publicly. I am convinced that his daughter, but for your control of her mother and her life, would enjoy a healthy, loving relationship with her father. Therefore you must do whatever is within your power to reunite them.

2. You know about the Ed Roberts case because Ms. artilson interrogated me about my providing assistance to Mr. oberts in my last series of depositions in Armstrong II, and one of your lawyers, Marcello Di Mauro, in earlier times communicated about him with Ford Greene. Ed Roberts is a friend of mine who

was sucked dry and flat out robbed by your registrars on the way to an up- or downstat week of no consequence to anyone as it turns out, and always does, but Ed.

I have found myself in the silly position of being the only person in the world willing to help Mr. Roberts against your organization. Again, I have no desire to have Mr. Roberts engage you in litigation. In fact his situation can be resolved without your fomenting not only more litigation, but more ill will and silliness. For you it is merely an accounting matter. You ripped Mr. Roberts off; now pay him what is needed to make him whole again.

Mr. Roberts' case of Scientology lies, threats, treachery and thievery, his own money then used to pay your pittiless pettifoggers to prevent him from anything resembling redress, is being played and replayed every day of the year in your orgs. I would think that the three or so million you wasted on your inane USA Today ads to counter Richard Behar's few good pages could have taken care of three hundred Mr. Roberts and done a heap of good.

All your ads did was a heap of bad: more lies, more hate, more embarrassment for Scientologists everywhere, another dead forest, and an uncharitable little delay to your victims before they are made whole. The Ed Roberts case is, in my opinion, the proof of Time's theme: that you are - all of you at the top of your organization - a cult of greed. But worse, you squander your plunder, as witness Toronto, starve the good and fatten your PIs and proctors and their proctologists. And all with the fatuous excuse of a right to defend wrongness and attack rightness because your "religion's" stupidity is, in our courts of law, beyond question.

Anyway I want to have Ed's needs taken care of toot sweet. He probably wouldn't think less of you if you didn't apologize, but I think it's a good idea and sure couldn't hurt.

3. I don't care what order everything is done in. I think whatever is most practical, sensible and ergonomically sound is the way to approach this particular program, which, I'm sure can be wrapped up in a couple of days.

4. This is easy. These Ingram-generated efforts have only served to shine a light on your invidiously scheming enterprise. All your similarly baseless bar complaints against my other lawyer, Michael Flynn, came to nothing. You should learn from the earthworms. Filing no spurious bar complaints whatsoever they demonstrate their superior philosophy.

5. Although they're in the range of, I don't think fees and costs are over $500,000. Clearly nothing is going to happen

unless you cover my attorneys' fees and costs. To leave me with that indebtedness is unfair and unworkable. You will recall that I made a proposal in 1984, being then scared and weak: pay my lawyers' fees and costs of, I guessed, $150,000, and I'll quit. You, and in those days, Hubbard, said no way. I, less scared and much stronger, urge you to choose again.

6. Dismissal of the cross-complaint is easy. I'll take care of it.

8. I'm aware this may for a long time remain a pettiness you'd rather not confront. But I can guarantee that if you return my materials - the Hubbard letters manuscript, the Cones, all the other materials you and your PIs have stolen from me over the years, I will not bring criminal charges, and I won't even bring the subject up again.

9. You have to cancel the settlement agreement in order to demonstrate to yourselves that it was the wrong thing in which to put your faith. You will notice that when you cancel the agreement nothing will happen. Yet you will have freed me. And that is what you should make Scientology's only business: freeing people. You will also observe that when you free me you free yourselves; in fact you cannot yourselves be free unless you free me.

Regarding my relationship with you after you cancel the agreement, that is where you must reassert your faith. Have the faith that I will neither say nor write worse things about you if you free me to do so. As you know I can say some pretty pointed things about you now just because you won't cancel that degrading document. Put faith in what occurs in silence. Put faith in the inevitable.

7. You decide. If you think I did a lousy job unfomenting your litigation, pay me zippo. Even if it all works for everyone, timing inspired and ideas a Godsend, you don't have to pay me anything. I generally don't refuse what's offered. You know how much I'm worth.

I haven't forgotten Wollersheim, Yanny I & II, the Aznarans, the CAN litigation, claimants all over the place, your government lawsuits, the rest of the settlement signatories, your taxes, nor your image and media distress, and I think it's appropriate to say that I can help you unfoment those problems as well. I would, of course, need half a chance.

If you look deep in your hearts I believe you'll find you really do not want Scientology's legacy to be one of suppression; suppression of the Constitution, human dignity, truth, religion, justice, even suppression of your own good selves. Wouldn't it be better to be known as the people who ended the madness in peace and style; a radical recognition of the transcendence of quantum scientology. LRH was Newtonian in his physics and relativistic epistemologically. I like to call one aspect of my philosophy, *inter alia* non-mutual exclusivity.

I believe that everyone will become a person of good will, that everyone already is, has been and will forever be, that there is progress and perfection, hope and reason, that to know who we are we must accept the truth of our relationship to our Creator, that all about us that we made is illusion, that we have reason to be grateful that is so, that our Creator, God, our Father Loves us in the same Love by which He created us and holds us always safe and always loved in that Love, that we, His children, are one and One with Him, that the means by which He is remembered, and hence our relationship, and hence who we are, and hence what we know, is forgiveness, that forgiveness is the recognizing of illusion for what it is, that creation is our nature, and that everything is all there is.

With a wish for peace in 1993, I remain hopeful and,

yours sincerely,

Gerald Armstrong
715 Sir Francis Drake Blvd.
San Anselmo, CA 949650
(415)456-8450

:ga

cc: Malcolm Nothling
Ed Roberts
Lawrence Wollersheim
Richard & Vicki Aznaran
Richard Behar
Ford Greene, Esquire
Paul Morantz, Esquire
Joseph A. Yanny, Esquire
Toby L. Plevin, Esquire
Graham E. Berry, Esquire
Stuart Cutler, Esquire
Anthony Laing, Esquire
John C. Elstead, Esquire
Michael J. Flynn, Esquire
Fr. Kent Burtner

Margaret Singer, PhD.
Cult Awareness Network
Daniel A. Leipold, Esquire
Church of Scientology International
Church of Scientology of California
Religious Technology Center
Church of Spiritual Technology
Church of Scientology ASHO
Church of Scientology AOLA
Founding Church of Scientology of Washington, D.C.
Church of Scientology Flag Service Organization
Church of Scientology of Arizona
Church of Scientology of Los Angeles
Church of Scientology of Stevens Creek
Church of Scientology of Sacramento
Church of Scientology of San Francisco
Church of Scientology of Washington State
Church of Scientology of Boston
Church of Scientology of Portland
Church of Scientology of New York

7164

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LEONARD B. BOUDIN (1912-1989)
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*ADMITTED IN CALIFORNIA ONLY

COUNSEL
VICTOR RABINOWITZ
HAYWOOD BURNS
LEONARD I. WEINGLASS
JOHN MAGE
JUDITH LEVIN

7-10-91

July 3, 1991

Gerald Armstrong
P.O. Box 751
San Anselmo, California 94960

Re: Malcolm Nuthling v. Church of Scientology

ear Mr. Armstrong:

I have your letter of June 21. The Church is not interested in trying to settle the Malcolm Nuthing case in South Africa through your intervention. In addition, it is the position of the Church that any voluntary agreement by you to testify in such a case, in South Africa, without compulsion of subpoena, would violate your settlement agreement.

Very truly yours,

Eric Lieberman /SL

Eric M. Lieberman

EML/sl

June 21, 1991

Eric M. Lieberman, Esq.
Rabinowitz, Boudin, etc.
740 Broadway, Fifth floor
New York, NY 10003

Via Federal Express

Dear Mr. Lieberman:

I received a call yesterday from Malcolm Nothling, the plaintiff in a defamation case against the organization in South Africa. He asked me to testify at the trial in early August.

After listening to his story and his understanding of organization philosophy and practises I agreed. I said, however, that I would first attempt to bring about a peaceful resolution of the Scientol-ogy conflict. Hence I'm writing you.

You will receive a photocopy of this letter because the original of my significant holographs are the property of a third party corporation by contract. I will, nevertheless, sign the photocopy, not so much because you or the organization representatives might doubt that I am the writer, but to add fifteen dollars to the value of *your* archive.

And all of that is just another way of saying that serious matters are nothing to lose a sense of humor over.

I am certain that the Nothling matter

can be resolved easily with the following organizational actions:

1. A sincere public apology for its "declare" and other antisocial acts.

2. A sincere, public and complete repudiation of " "fair" game," philosophy of attack, vengeance and hatred, and elimination from Scientology literature of all policies advocating such philosophy.

3. Monetary settlement.

Mr. Nothling says he has no hope that the organization would do any of 1-3; and I recognize that it has exhibited no sign of rethinking its antisocial philosophy and practises. I also recognize that someday it will, and I do what I do because I believe it can be without, and not compelled by, a great human tragedy.

Thus far the organization has attempted to solve its problems with aggrieved individuals with mere monetary settlements and the occasional insicere announcement; e.g., Hubbard's famous elimination of the term "fair game," because it "causes bad PR," or the more recent blaming of the GO for all things bad and bastardly. And so the organization has brought upon itself more problems and made more aggrieved individuals who seek sincerity but end up taking insincerity and money.

Because I will go wherever my help is ~~askef~~ asked for I will continue until the organization sincerely denounces "fair" "game" in all its forms, or kills me. It should be understood that I have many things to do in my work, far more important than the application of ethics to the organization of Scientology. I do this because it is asked of me by those aggrieved. When there are no longer any aggrieved asking for my help I will do something else. Clearly there are others aggrieved by other organizations or nations who

can use my help. They
simply have not asked
for it. It may be
that the Scientology issue
must be resolved in my
life before I am called
to help the others. I
am not, and I'm sure
you're also not, unaware
that the organization has
used my willingness to
respond to requests for
my help to entrap me
and attack me. The
only observable effect of
the organization's ops and
web of deceit has been
an increasing willingness

⑨

to help those likewise aggrieved by them.

I truly believe that the organization's problems can be easily eliminated. It can only be done philosophically; and since its philosophy contains within it the philosophical idea that its philosophy cannot be changed, it continues to appear that nothing can be done. that fact does not make a philosophic shift difficult, it simply means that it's a pretty silly philosophy.

Hubbard didn't have any original ideas just because there are ~~or~~ no original ideas. There are only two ideas and Hubbard chose the least effective and most boring of the two; the same idea which prevails in society. He wasn't worse than everyone else; he was the same. Scientology, by espousing the same idea as Hubbard and everyone else is ineffective and boring.

The real opposition is to Scientology's insistence

(11)

that it is a religion. It isn't. It could be, but it isn't. And it isn't no matter what any government says it is, or any court or any lawyer. Almost the last people you'd want determining what is or is not a religion are judges and lawyers, since their profession depends on conflict, which within a religion cannot exist.

Among all human activities there is only one which is religious — And that, forgiveness.

technically, and in every sense, in the recognition that what needs to be forgiven didn't happen. It is somewhat difficult, of course, for the organization, which uses peoples' pasts against them, to understand this simple fact.

I am certain that Hubbard caught a glimmer of this understanding, but did not triumph over his fear so chose instead of forgiveness, condemnation. There is nothing within that choice which threatens reality, or for which Hubbard should be condemned. It is merely not religion.

All of the things the organization does can be done by non-religious organizations or individuals. But forgiveness can only be done by the religious. Scientology, by publishing and defending its policy of unforgiveness; i.e., "fair game," "attack the attacker," SP declares, sec checks, lower conditions, etc., etc., is not to be condemned;

it is to be forgiven; but it is not a religion.

A church's only function is forgiveness and sanctuary. Since Scientology collects the facts of its members' past, for control, or any purpose, the it is not a church. lawyers and courts may call it a church, but it is like any non-church organization; e.g., KGB, ~~go~~ republican party, etc. A church to be a church cannot maintain a cause of action. Others, carrying out their purpose, might choose to defend it, but a church, to be a church, would not defend itself. Of course, an organization with a stated senior policy that the best defense is attack, cannot be a church.

The world would welcome Scientology's doing something effective, yet condemnation, attack and hatred are without effect, and so the world continues to wait. And the Scientologists continue the boredom of unforgiving

lives, and the lawyers
and the few in control
get rich and stay bored.
And yes there are un-
forgiving and bored on
both sides. But the
forgiving are on no side.
And I go where I'm asked
to help. You haven't
asked but I hope this
helps anyway.

Mr. Lothling will call
me in about a week.
I'll be reachable until
then at (604) 795-5852.

I believe you understand whence I come, and I believe someone can do something.

Very truly yours,

G.

PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR CERTIFICATION OF ISSUES FOR APPEAL; ORDER

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail a San Anselmo, California: SEE SERVICE LIST

[X]	(By Mail)	I caused such envelope with postage thereon fully prepaid to be placed in the united States Mail at San Anselmo, California.
[ ]	(Personal Service)	I caused such envelope to be delivered by hand to the offices of the addressee.
[ ]	(State)	I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
[X]	(Federal)	I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

DATED: July 3~~1~~0th, 1992

G.

Aznaran v. Scientology: Service List

JOHN CLIFTON ELSTEAD
Attorney at Law
4900 Hopyard Road, Suite 240
Pleasanton, California 94588

Earle C. Cooley
COOLEY, MANION, MOORE, & JONES, P.C.
21 Custom House Street
Boston, Massachusetts 02110

Laurie J. Bartilson
BOWLES & MOXON
6255 Sunset Boulevard, Suite 2000
Los Angeles, California 90028

James H. Berry, Jr.
BERRY and CAHALAN
2049 Century Park East
Los Angeles, California 90067

PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR CHANGE OF VENUE TO NORTHERN DISTRICT OF TEXAS; ORDER on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California: SEE SERVICE LIST

[X] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the united States Mail at San Anselmo, California.

[ ] (Personal Service) I caused such envelope to be delivered by hand to the offices of the addressee.

[ ] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

[X] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

DATED: July 3~~1~~ 9th, 1992

Aznaran v. Scientology: Serv.ce List

JOHN CLIFTON ELSTEAD
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BERRY and CAHALAN
2049 Century Park East
Los Angeles, California 90067

Marin Independent Journal, Wednesday, November 11, 1992

7184

IJ photo/Frankie Frost

CASH CRITIC: Gerald Armstrong of San Anselmo reflects on how the world would be a better place without money

Is money the root of problems?

Critic of cash, credit urges monetary abolition

By Richard Polito

Independent Journal reporter

Gerald Armstrong has an idea for dealing with the national debt — write it off. Forget it. It doesn't exist.

It's that easy.

The novel prescription for fixing the fiscal fiasco is only part of Armstrong's larger message that money should be abolished. No more pay checks, no more loan payments, no more taxes, and forget that $20 you owed your brother-in-law.

Bank presidents would clean up litter. Donald Trump could get a real job. The Financial District would be a ghost town with marble lobbies — and lots of parking.

And it all starts today.

In a rare moment of realism, Armstrong admits today's deadline "is probably not going to be achieved."

Renouncing cash, credit

Armstrong, self-proclaimed founder of the Organization of United Renunciants, set the date for people who have taken his "pledge of renunciation" to stop using money. Fellow renunciants will renounce all cash and credit, stop taking money, stop paying with money, forgive all their debts and stop keeping financial records.

The critic of credit has already put his money where his doubts are. He gave it all away. And it was more than pocket change.

Armstrong won an $800,000 settlement in a harassment suit against the Church of Scientology six years ago. Once a member of the inner circle, he is now a vocal critic.

Armstrong doesn't expect everyone to buy in from the start, just "somewhere between 1 and 11 percent."

He's a tad short. Armstrong can count only a handful of friends as converts, but he is trying to get the word out. Detailed proposals have gone out to Bill Clinton, Ross Perot and Pete Wilson (no one has tapped him for an economic advisory post just yet.) He has also written to the New York Times and other mega-media.

Ted Koppel has not called.

Money considered valueless

Armstrong is not discouraged.

The monetary messiah insists there is much about daily life that will not change. People will still go to work, shop at the market and pick out a new car every few years. They just wouldn't exchange any money along the way.

Money, in Armstrong's eyes, has no value and the existence of money has created entire industries that do nothing more than transfer mythical essences of value from one account to another.

In Armstrong's cashless Utopia, there would be total employment because people could do jobs they wanted to do and companies could employ more workers because they would not have to pay them. Farmers would still farm. Autoworkers would still make cars. Sewer workers would still shovel sludge.

And Disneyland would no longer charge admission.

ORIGINAL

FILED
SEP 18 1995
HOWARD HANSON
MARIN COUNTY CLERK
by J. Steele, Deputy

7185

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450
In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

EVIDENCE IN SUPPORT OF OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT

Date: 9/29/95
Time: 9:00 a.m.
Dept: One
Trial Date: Not Set

VOLUME V

DECLARATION OF GERALD ARMSTRONG

1. My name is Gerald Armstrong. I am the defendant and cross-complainant in the above action, am above the age of 18 years old and am competent to testify to the matters set forth herein on the basis of my own first-hand knowledge as either a human being, litigant or witness.

2. In the instant case I provided deposition testimony and was present for depositions of co-defendant Michael Walton as well as for Lynn Farny whom Church of Scientology International produced as its corporate representative for the purposes of this litigation pursuant to Code of Civil Procedure section 2025 (d).

3. I am the defendant in Church of Scientology International v. Armstrong, Los Angeles Superior Court, Case No. BC 053295 and have provided deposition testimony therein and have been present during the deposition testimony therein of Michael Walton.

4. I was a witness in Church of Scientology International v. Yanny, Los Angeles Superior Court, Case No. BC 033035 and provided deposition testimony therein.

5. I am a former member of the Scientology organization and am familiar with the policies and procedures thereof.

6. Attached hereto and incorporated herein are true and correct copies of the following items:

EXHIBIT 1(A): Declaration of Nancy Rodes dated November 29, 1989;

EXHIBIT 1(B): Certificate of Saint;

EXHIBIT 1(C): Deposition testimony of Armstrong in Church of Scientology International v. Yanny, Los Angeles Superior Court, Case No. BC 033035 ("Yanny II")

EXHIBIT 1(D): Declaration of Gerald Armstrong dated January 13, 1994.

EXHIBIT 1(E): Gerald Armstrong's prayer to God and His Answer dated August 13, 1990.

EXHIBIT 1(F): Deposition testimony of Gerald Armstrong in Church of Scientology International v. Armstrong, Los Angeles Superior Court, case No. BC 053295 ("Armstrong II")

EXHIBIT 1(F): Deposition testimony of Michael Walton in Church of Scientology International v. Armstrong II.

EXHIBIT 1(H): Deposition testimony of Gerald Armstrong herein.

EXHIBIT 1(I): Deposition testimony of Michael Walton herein.

EXHIBIT 1(J): Letter from Armstrong to Andrew Armstrong;

EXHIBIT 1(K): Letter from Armstrong to Lorrie Eaton;

EXHIBIT 1(L): Letter from Armstrong to Jerry Solfvin;

EXHIBIT 1(M): Letter from Armstrong to Bruce, Tricia and Anne-Leigh (Dawson Family);

EXHIBIT 1(N): Letter from Armstrong to Michael and Kima Douglas ("Douglases");

EXHIBIT 1(O): Letter from Douglases to Armstrong;

EXHIBIT 1(P): Promissory Note from Douglases to Armstrong;

EXHIBIT 1(Q): Promissory Note from Douglases to Armstrong;

EXHIBIT 1(R): Promissory Note from Douglases to Armstrong;

EXHIBIT 1(S): Note from Douglases to Armstrong.

EXHIBIT 1(T): Order dated March 9, 1990 in Church of Scientology of California v. Armstrong, California Court of Appeal, Second Appellate District, Case No. Bo25920.

EXHIBIT 1(U): Deposition testimony of Lynn Farny ("Farny"), Secretary and corporate representative of plaintiff CSI;

EXHIBIT 1(V): Hubbard Communications Policy Letter "Verbal Tech: Penalties"

EXHIBIT 1(W): Hubbard Communications Policy Letter "Policy:

Source Of"

EXHIBIT 1(X): Hubbard Communications Policy Letter "Seniority of Orders"

EXHIBIT 1(Y): Hubbard Communications Policy Letter "Policy and Orders"

EXHIBIT 1(Z): Hubbard Communications Policy Letter "Suppressive Acts - Suppression of Scientology and Scientologists"

EXHIBIT 1(AA): Flag Conditions Order 6664

EXHIBIT 1(BB): Flag Conditions Order 6664R

EXHIBIT 1(CC): Flag Executive Directive 2830RB "Suppressive Persons and Suppressive Groups List

EXHIBIT 1(DD): Office of Special Affairs International Executive Directive No. 19 "Squirrels."

EXHIBIT 1(EE): Hubbard Communications Policy Letter "Penalties for Lower Conditions."

EXHIBIT 1(FF): Hubbard Communications Policy Letter "Cancellation of Fair Game."

EXHIBIT 1(GG): Hubbard Communications Policy Letter "How to Handle Black Propaganda - Rumors and Whispering Campaigns,"

EXHIBIT 1(HH): Hubbard Communications Policy Letter "Black PR,"

EXHIBIT 1(II): Dissemination of Material" from "Magazine Articles on Level 0 Checksheet,"

7. After I divested myself of my assets and material possessions in August 1990, I was not insolvent because the debts that I owed did not exceed my ability and means to pay them.

8. I have and never have had any agreement, secret or otherwise, with any of the beneficiaries of my gifts of my assets or my forgiving of debts owed to me in August, 1990 whereby any of said beneficiaries are holding such assets or amounts owed in trust for me, or otherwise have an intent to return such assets or

amounts owed to me.

9. In August, 1990, I had no intent to violate the settlement contract and no intent to deprive Scientology of its ability to collect damages owed to it.

10. In August, 1990, I had not engaged in any conduct that could possibly be construed as having violated the settlement contract, with the exception of requesting permission from the Court of Appeal to participate in the litigation of my own appeal, which paragraph 4 of the settlement contract prohibited me from doing. In support of my request for permission to so participate in his appeal I submitted the settlement contract to the Court of Appeal under seal.

11. From 1971 through 1981 I was a member of Scientology's elite "Sea Organization." The Sea Organization runs Scientology. During that time I became familiar with the Hubbard Communication Policies entitled "Penalties for Lower Conditions" dated 18 October, 1967 and "Cancellation of Fair Game" dated 21 October, 1968, true and correct copies thereof are attached hereto as Exhibits EE and FF respectively. I learned and knew while inside Scientology that the "cancellation" of Fair Game is of the name only, and does not affect the way SPs (suppressive persons) are to be treated.

12. During the time I was inside Scientology I was also familiar with the article written by L. Ron Hubbard entitled "Dissemination of Materials," know that it was uncancelled and valid Scientology policy during the time I was inside, and I have personal knowledge that the way in which Hubbard orders that opponents be dealt with in said article is exactly what was

intended and carried out by the Scientology organization. A true and correct copy thereof is attached hereto as Exhibit GG.

Under penalty of perjury and pursuant to the laws of the State of California I hereby declare that the foregoing is true and correct to the best of my personal knowledge. Executed this August 12, 1994 at San Anselmo, California.

GERALD ARMSTRONG

PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: EVIDENCE IN SUPPORT OF GERALD ARMSTYRONG' MOTION FOR JUDGMENT, OR, IN THE ALTERNATIVE, FOR SUMMARY ADJUDICATION OF ISSUES on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

LAURIE J. BARTILSON, ESQ.
Bowles & Moxon
6255 Sunset Boulevard, Suite 2000
Los Angeles, California 90028

Andrew Wilson, Esquire
WILSON, RYAN & CAMPILONGO
235 Montgomery Street, Suite 450
San Francisco, California 94104

MICHAEL WALTON, ESQ.
707 Fawn Drive
San Anselmo, CA 94960

[X] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

[ ] (Personal) I caused said papers to be personally service on the office of opposing counsel.

[X] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: August 12, 1994

DECLARATION OF NANCY RODES

I, Nancy Rodes, declare:

1. I have known Gerald Armstrong since 1978.
2. I have been his hagiographer since 1984.
3. I know him to be a religious figure.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 28th day of November, 1989, in Oakland, California.

Nancy Rodes

NANCY RODES

THE CHURCH

In recognition of the Faith, Love and Charity
he displays, does Hereby Name

Gerald David Armstrong

As a

SAINT

By the Authority Invested in Us, as Two or More Members of the Church
Gathered Together in Thy Name, Signed this 18th Day of October, 1987:

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

- - -

RELIGIOUS TECHNOLOGY CENTER, A California Non-Profit Religious Corporation; CHURCH OF SCIENTOLOGY INTERNATIONAL, A Non-Profit Religious Corporation; and CHURCH OF SCIENTOLOGY OF CALIFORNIA, A Non-Profit Religious corporation, Plaintiffs, vs. JOSEPH A. YANNY, an individual; JOSEPH A. YANNY, a professional law corporation, and DOES 1-25, inclusive, Defendants.	No: BC 033035 VOLUME III

VOLUME III - DEPOSITION OF

GERALD ARMSTRONG

SANTA MONICA, CALIFORNIA

MARCH 16, 1992

ATKINSON-BAKER AND ASSOCIATES, INC.
CERTIFIED SHORTHAND REPORTERS
1612 West Olive Avenue, Suite 203
Burbank, California 91506
(818) 566-8840

REPORTED BY: JAN SERRA, CSR NO. 8207

FILE NO.: 9202566

would decline to answer. I don't think that that's appropriate, and I would assert a right of privacy with regards to membership. Even numbers.

Q Could you answer anyway please?

A No, I decline to answer that.

THE REFEREE: I don't see that the numbers as such, I don't think the disclosures of numbers as such could be of purely substantial significance one way or another. But I do instruct you to answer.

A Okay.

Then of those that I know about, approximately 30.

Q BY MR. MOXON: How does one become a member?

MR. PATEL: I've held my tongue on this, but a lot of this has been asked and answered in the prior two volumes. If I could just register that objection.

THE REFEREE: Have these question's been asked and answered?

MR. GREENE: Yes, in fact they have.

I have not jumped in just for the sake of establishing some kind of foundation and context for Your Honor. But almost all of the questions thus far have been previously asked and answered.

MR. MOXON: Your Honor, these questions have been answered. A number of them have been refused to be answered. It's impossible to have any context to any of these questions unless some of these foundational questions are laid. Perhaps five minutes as to questions as to several of these foundations.

THE REFEREE: Are we past that point now?

MR. MOXON: Pretty much.

THE REFEREE: Then we'll treat these as foundational so far and go from here.

MR. MOXON: Thank you.

Q BY MR. MOXON: How does one become a member?

A One agrees that the belief of the Church is that when members are together, God is present.

Q Is there, is anything in writing?

MR. GREENE: You mean with respect to how one becomes a member?

MR. MOXON: Yes.

A That has now been put to writing in the last deposition transcript, and I believe the deposition transcript before that.

CAP

~~But, a~~nd the belief and the corrolary and the obvious are in writing, have been in writing since

1986.

Q BY MR. MOXON: The only writing with respect to membership is in the deposition transcript?

MR. GREENE: Objection, that is an argumentative question. He just answered the question saying that there had been writing since 1986.

THE REFEREE: Well, sustained, just as to form.

Q BY MR. MOXON: I'm just talking about the membership now.

As to membership, is the only writing of how one becomes a member your prior deposition transcript?

A No.

The belief, the corrolary and the obvious have been in with writing.

Q What's "the belief?"

MR. GREENE: Objection, asked and answered.

A The belief is that when members of the Church are together, God is present.

Q BY MR. MOXON: Is there any other belief?

A There may be many other beliefs, but that is the belief of the Church.

Q I'm sorry, I don't understand your

answer.

Is there any other belief of the Church?

A Not in writing.

Q What's "the corrolary?"

A That whatever is said or done when members of the Church are together is sacred.

Q What's "the obvious?"

A That it has always been that way, is now and will ever be so.

Q Is anything else, any other practices, beliefs or dogma of the Church in writing other than what you just testified concerning "the belief, the corrolary and the obvious?"

A There is something that I call spin off.

Q What's "spin off?"

A One piece of spin off is that when a member of the Church is together, God is present.

Q I don't understand your answer.

When a single member is present God is present?

A When he's together, God is ~~together.~~ present

Q I don't understand.

You're using a singular -- when a member is together with what?

A When he's together.

Q What do you mean by, would you define your use of the word "together?"

A Not split into separate parts.

Q So when a member is not split into separate parts, what happens?

A God is present.

Q Any other policies or beliefs?

MR. GREENE: Objection. The term policy, belief, dogma is getting thrown around kind of loosely and they're compound.

Why don't you just ask one question at a time?

THE REFEREE: Alright. Just as to form.

Q BY MR. MOXON: Are there any other policies, other than what you've stated, to the Church?

A The Church really has not given any policies. The Church has stated its belief, corrolary thereto and the obvious. The spin off is something which ~~I~~ came to me~~an~~ rather humorously.

CAP

~~Most~~ there has been far more written about the Church and about Church practices and dogma in my deposition transcripts than in any other place.

Q You say the Church has stated a belief --

A The Church.

Q Where has the Church stated a belief?

MR. GREENE: Objection, it's argumentative.

It's badgering the witness.

MR. PATEL: Also asked and answered.

THE REFEREE: Other than the answers you've already given, can you answer this question?

A I'm not quite sure what you want in addition to what I've stated.

Q BY MR. MOXON: Alright.

Well, there is nothing else? There are no other written statements of beliefs, corrolaries, obvious doctrines, policies or dogma other than what you've already stated, is that correct?

A Right. Those are what have been written.

Q Do you have any ordained ministers?

MR. GREENE: Objection, vague as to "ordained."

MR. PATEL: And if I may also make an objection, based on the prior testimony I believe that the use of the term "ministers" may be vague and ambiguous.

A Perhaps I can --

THE REFEREE: Go ahead.

A -- help out.

Members of the Church, should they choose ⑨ to perform the function of ministers.

Q BY MR. MOXON: Correct me if I'm wrong then.

As I understand your testimony there are no ministers per se, but if a member chooses to be a minister you consider him to be a minister?

A I generally do not use the title "minister." But I understand the function of a minister. So in that sense members of the Church may perform that function.

Q You say they may perform that function.

As I understand it, again, from your prior testimony, there are no ministers per se, correct?

A The title may or may not be used. I do not use that title.

Q You actually don't have any titles in the Church at all, correct?

A I'm the founder.

Q Other than your title as founder?

A That's the only title that I have in the Church.

Q By the way, when did you found this Church?

A 1986.

Q So you don't have any ordained ministers, correct?

MR. PATEL: Same objections.

THE REFEREE: I think it has been asked and answered, so let's go ahead.

Q BY MR. MOXON: You indicated that everything -- whenever two members of the Church are together everything they say is sacred.

Is that a fair approximation of this corrolary?

A Whatever is said or done between members of the Church is sacred.

Q Suppose two members of the Church commit a criminal act, is that sacred, if they do it together?

A I have never entertained that idea, because by its nature the Church does not lend itself to criminal acts.

Q I'm not talking about an act of the Church, I'm talking about acts of two members.

If two members commit a criminal act together is that a sacred act of the Church?

A I really can't answer that. I don't know what you mean by "a criminal act."

STATE OF CALIFORNIA)

COUNTY OF LOS ANGELES)

I, JAN W. SERRA, CSR No. 8207, Certified Shorthand Reporter, certify:

That the foregoing proceedings were, taken before me at the time and place therein set forth, at which time the witness,

GERALD ARMSTRONG,

was put under oath by me;

That the testimony of the witness And all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of any of the parties, nor financially interested in the action.

Dated this March 24, 1992.

Jan Serra

Certified Shorthand Reporter

8-1[illegible]90

Please guide me.
Keep nothing.
Give what you have to
the poor.
Take only what you need.

EX 1
3/18/94
GA

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

--oOo--

COPY

CHURCH OF SCIENTOLOGY INTERNATIONAL,
a California not-for-profit religious
corporation,

Plaintiff,

vs.

No. BC 052395

GERALD ARMSTRONG; DOES 1 through 25,
inclusve,

Defendants.

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DEPOSITION OF
GERALD ARMSTRONG

Wednesday, July 22, 1992

Volume II, Pages 179 - 293

REPORTED BY: KATHERINE NG, CSR NO. 6350

A. No.

Q. Did you give any of it to Michael Walton?

A. Yes.

Q. Why did you give it away?

A. Because I considered that I was guided to do so.

Q. By whom?

A. The source of all that is.

Q. Who is that?

A. God.

Q. Now, when God guided you to give away all your assets, did he guide you to give them to particular people or did you make that decision?

A. I believe that I was guided each step of the way.

Q. Okay. When you say you gave it away, I take it you didn't receive anything in return in terms of monetary compensation?

A. Right.

Q. Can you tell me why you decided to give some of it to Michael Walton?

A. Because it was logical.

Q. Why?

A. And because it was so guided.

Q. Can you tell me what about it was logical?

A. I guess initially it's logical because he was a friend of mine in close proximity to me, and I believed that he had a need at that time.

Q. Okay. What did you give him?

A. I decline to comment to answer that. I don't see how it fits into this, other than the fact that I gave everything away.

Q. I won't press that at this point, but it will be relevant.

Q. What did you have in August of 1990 that you gave away?

A. Cash, property, stock, rights and debts owed to me.

Q. Okay. Let's start with the cash. How much cash did you give away?

A. I don't think that that's appropriate for me to get into. I decline to answer.

Q. Well, I'll tell you why it's relevant. And if it isn't, it can be made relevant by the complaint. Under the Fraudulent Conveyance Act, fraudulent conveyances are defined in a number of ways, including transfers without considerations, which these are by virtue of Mr. Armstrong's testimony.

A. By which you mean therefore every donation made by every Scientologist is of necessity a fraudulent

7208

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

--oOo--

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff,	ORIGINAL
vs.	Case No. BC 052395
GERALD ARMSTRONG; and DOES 1 through 25, inclusive, Defendants.	

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DEPOSITION OF MICHAEL WALTON

Pages 1 - 61

Taken before CHRIS DE GEORGE

California CSR License No. 7069

February 24, 1993

--oOo--

my lawyer files and I don't know if they belong -- some of them, I'm sure, belong to Gerald Armstrong.

Q. Let's exclude those.

A. No.

Q. So excluding attorney-client files, you hold no property for or on behalf of Gerald Armstrong.

A. No.

Q. And he's never transferred any property to you.

A. Yes, he has.

Q. What has he transferred to you?

A. He transferred his interest in Fawn Drive to me.

Q. And what consideration did you pay him for that?

A. None.

Q. It was a gift?

A. Yes.

Q. And when did that occur?

A. I think it was around the time of the Desert Storm. I don't -- I really don't -- I'm not quite sure. I can tell you it was -- it was approximately a year before the -- No, I can't tell you that either. I'm not really sure.

Q. Do you know why he transferred it to you?

A. I know what he told me.

Q. What did he tell you?

A. I'm trying to remember it. Let me think about it and see if I can remember under what circumstances.

I don't believe this has any relation to any representation. Jerry told me that he'd had a vision from God.

Q. That's it?

A. That's the reason. That's when he divested of all property that I know of.

Q. Where is Jerry living now, do you know?

A. No, I don't. I think he's living on Sir Francis Drake. 711, I think.

Q. That's one of the -- that's either adjacent to or the office where Ford Greene has his practice?

A. That's my understanding although I've never been there.

Q. Other than Fawn Drive, did Mr. Armstrong give you any other property at that time?

A. Yes.

Q. What else?

A. A dining room table and I think a ladder.

Q. Let's forget about the dining room table and the ladder. That's it, just the dining room table, the ladder and the house; is that right?

A. Yes.

Q. No cash?

A. No, there was a cash fund that was set up to run the house for a year and that -- my name was already on that although it was my understanding that it was -- it was to be transferred and still to be used for the house if I wanted it.

Q. You and Mr. Armstrong became involved in a partnership that owned 711 Fawn Drive, is that right? I got the address wrong. Let's just call it Fawn Drive.

A. Well, at this point you know I have to -- I made a judgment to -- At some point this invades my right of privacy, personal privacy. I'm not sure what my -- my dealings with Mr. Armstrong have to do with this litigation. When I asked Ms. Bartilson, she said there was some concern that he had fraudulently transferred property and I'm not sure how that -- I didn't -- I haven't read the pleadings but I haven't seen any allegations of

STATE OF CALIFORNIA)
)

I, the undersigned, a Certified Shorthand Reporter of the State of California, hereby certify that the witness in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein stated; that the testimony of said witness was reported by me, a Certified Shorthand Reporter and a disinterested person, and was thereafter transcribed under my direction into typewriting; that the foregoing is a full, complete and true record of said testimony; and that the witness was given an opportunity to read and, if necessary, correct said deposition and to subscribe the same.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing deposition and caption named, nor in any way interested in the outcome of the case names in said action.

IN WITNESS WHEREOF, I have hereunder set my hand and affixed my signature this 1st day of March, 1993.

CHRIS DEGEORGE, CSR #7069

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

--o0o--

CHURCH OF SCIENTOLOGY, INTERNATIONAL, A California Not-For-Profit Corporation,

Plaintiffs,

vs.

GERALD ARMSTRONG, MICHAEL WALTON, et al.,

Defendants.

CERTIFIED COPY

No. 157 680

DEPOSITION OF

GERALD ARMSTRONG

--o0o--

Thursday, March 17, 1994

REPORTED BY: Sheenagh M. Carlson, CSR NO. 8350

Q. Okay. You don't recall; is that --

A. No, it wasn't, wasn't a huge amount, if it was.

Q. So if you had some, it was some fairly minor amount, a few thousand dollars?

A. Something like that.

Q. All right. You had, whatever cash you had you had in the Fawn Drive house. What other assets did you have at that time?

A. I had the corporation.

Q. Okay. Your interest in TGAC?

A. Right. Right. And I was owed some money, and I had some cash flow from payments which were made to me.

Q. Is that the same thing, you were owed money and had cash flow from the payments that were made or two separate things?

A. Right, that's the cash you're looking for.

Q. Who owed you what?

A. Without getting into any names, there was an individual who owed me about 16.

Q. Thousand?

A. Yes. There was another individual who owed me 30. There was another, a family who owed me about 20,000. And there was another couple who owed me -- um, I'm not sure how much it is. I believe somewhere between 70 and 100. Something like that.

Q. Okay. Now, were all those amounts eventually paid back to you?

A. No.

Q. All right. Let's take the first individual with the 16,000. How much of that was not paid back?

A. The majority.

Q. Do you have -- that could be anywhere from 8,000 and up. Do you have any better idea than that?

A. Probably my recollection is about 15 of the 16 were not paid back.

Q. Can you tell me who that is, please, the person's name?

A. I know you'd like to make it relevant for this case, but I don't want to make all these people the target of your organization.

Q. I'd still like to know the name.

A. I know you'd like to, but I don't think that it's right to do that. I know that you'll add them in and I know you'll try to break them financially and I know you'll try to make their life miserable. I know you'll try to get to me by getting to them.

Q. Well --

A. And I know that you know that your fraudulent conveyance lawsuit is fraudulent.

MR. GREENE: Just answer the question, Gerry.

THE WITNESS: I don't want to answer that question.

MR. WILSON: Can I -- can you please instruct the witness to answer the question?

MR. BENZ: Okay.

MR. WILSON: I haven't even heard an objection.

MR. BENZ: There isn't an objection.

MR. GREENE: I'll object on the basis of relevance.

MR. WILSON: Well, I think --

MR. BENZ: Mr. Wilson?

MR. WILSON: I think it is relevant. I'm entitled to find out whether the forgiveness of that obligation might be a fraudulent conveyance. Notwithstanding Mr. Armstrong's polemics, that's all we intend to do. And we have no intent to harass anyone or bring them in unless it appears there was a fraudulent conveyance. But merely Mr. Armstrong telling me that he made a loan and it didn't get paid back and he won't tell me the name isn't really enough.

MR. GREENE: It's also not related to the allegations of the complaint.

MR. WILSON: No, the complaint contains allegations of fraudulent conveyance and I suppose -- we went through this before. We can allege that there may be other fraudulent conveyances that we don't know about. It's very common in litigation where you have one claim and you find out that you may have others that are similar.

MR. BENZ: I think in this case Plaintiff is entitled to know the name of the party. So, the witness is directed to answer the the question.

THE WITNESS: Okay.

BY MR. WILSON:

Q. What's his name, please?

A. Jerry Solfvin.

Q. Can you spell that?

A. S-O-L-F-V-I-N.

Q. You went too fast for me. Spell the last name.

A. S-O-L-F-V-I-N.

Q. And do you know where he lives, where I can find him?

A. I believe Oakland, California.

Q. Okay. Now, has there been a formal agreement between you and Jerry to forgive the indebtedness or is it that you just haven't pursued it?

A. I wrote him.

Q. What did you tell him when you wrote him?

A. I wrote him and said that I forgave his debt to me.

Q. Okay. When did you do that?

A. August 1990.

Q. All right. If you wanted to find that letter, could you do so?

A. I think so.

Q. Okay. Does the letter have the amount that's forgiven or does it say I forgive your debt?

A. It doesn't have the amount.

Q. Okay. Fair enough. Let's go to the

second individual. Who is that, please?

A. I'm not sure.

Q. The person that you owed 30,000, that owed you $30,000? Actually, there's -- yes. Who is that?

MR. GREENE: Same objection, relevance. Not relevant to the allegations of the complaint.

MR. BENZ: Same ruling.

THE WITNESS: Michael Walton.

BY MR. WILSON:

Q. Okay. Did you write him in August of 1990 and forgive the rest of this too?

A. Uh-huh.

Q. Do you remember how much it was?

A. How much what was?

Q. How much the balance was. You loaned him 30, how much was owed?

A. I don't, I don't know then.

Q. Do you have an approximate number?

A. I, it was close to that.

Q. All right. Now, you said there's a family that you owed, that you loaned 30,000 too. Who was that?

A. The Dawsons.

Q. And where are they?

A. Massachusetts.

Q. Okay. What are their first names, if you --

A. Um, Iolna, I-O-L-N-A.

Q. Uh-huh.

A. And then there are some children involved.

Q. Did you write to her in August of 1990 and forgive the balance of that debt?

A. Yes.

Q. And was it approximately 30,000?

A. Something like that.

Q. All right. I didn't ask you this question about the letter to Mr. Walton and the letter to the Dawsons. If you looked for those letters, could you find it?

A. I think so.

Q. The final one that you mentioned was a couple that you loaned 70 or $100,000 to. Who was that?

A. The Douglases.

Q. The Douglases?

A. Yes.

Q. That's Michael and Kimit?

A. Kim.

Q. Kima?

A. K-I-M.

Q. Okay.

A. Then there's another one too.

Q. I'm not finished with that one. I appreciate your volunteering, but did you also write them in August of 1990 telling them you forgave the debt?

A. Right.

Q. And you could find that letter if you looked for it?

A. I believe so.

Q. Okay. You said there was someone else?

A. Lorrie Eaton.

Q. Okay.

A. L-O-R-R-I-E, E-A-T-O-N.

Q. And how much was your loan to her?

A. I'm not sure. A few thousand.

Q. Five or six or seven?

A. Something. I don't know.

Q. All right. And did you forgive that in August of 1990?

A. Yes.

Q. Wrote her a letter?

A. Uh-huh.

Q. And you could find it if you looked for it?

A. I think so.

Q. All right. I'd like to go back to 1986 when you settled with the church?

A. I'd like to, too.

Q. So would the church. Do you recall when it was that you got the settlement payment from Mr. Flynn, approximately?

A. Sometime in December.

Q. Okay. Do you remember how much it was?

A. I think it came out to 518 something.

MR. WALTON: Could I, could I make an objection here regarding the relevance of all this stuff that's pre-1990 I believe is when, is it 1990, the date that the complaint alleges that there was a grievous behavior on the part of Mr. Armstrong? And all this stuff before, I'm not sure what is -- it's sort of like, not only does it seem to be irrelevant, but it seems to me, it looks like they are trying to do a sort of asset check before there's a judgment here.

MR. WILSON: Well, the relevance is essentially the same relevance as the names of the people he owed money to. We know of one conveyance that we believe is fraudulent. We may have found out about some others and there may be even more.

MR. WALTON: There may be more, but certainly if we're talking about your definition of fraudulent conveyance, which you've written about a number of times, the fraudulent conveyance makes you a creditor at the time there's a difficulty that's arisen and a right to claim yourself as a creditor. In 1986 or 1985, or '87, '88 or '89, you -- there's no claim anywhere that there was anything that would have given rise to creditor status at that time.

MR. WILSON: Well, that isn't really the issue. The issue is what, if you don't know what the person's assets were, you don't know what questions to ask to find out whether there were fraudulent conveyances. And this is discovery; this isn't a trial. So whether, whether it's relevant at trial is not at issue here. It's whether it might lead to discoverable evidence here. And asking Mr. Armstrong when he got the money, how much he got and what he did with it, might lead to discoverable evidence.

MR. WALTON: You represent the church and the church is the entity that, that wrote the checks. So, you know, your client knows exactly when and exactly how much was delivered. I mean, I'm not sure --

MR. WILSON: That's not true.

MR. WALTON: I don't see the relevance.

MR. WILSON: The settlement was a settlement with a group of people who were represented by Mr. Flynn and Mr. Flynn was the one who knew how much each of them got. The church did not know how much each of the settling parties got.

MR. GREENE: And witnesses.

MR. WILSON: Whoever.

MR. WALTON: But how much, how is it relevant? What's the --

MR. BENZ: If I can interrupt. I don't think I can rule on this question because this question is basically preliminary to the contract. Now, if we get into -- depends on where you go from there.

MR. GREENE: That's why I haven't

objected yet.

MR. BENZ: Okay.

MR. GREENE: I don't have any problem with this preliminary question and Gerald answering it. Whether it starts to go into other lawsuits or not, I'm waiting to see.

MR. WILSON: I have no intention of asking -- I mean, I want to know what happened to the money. That's what I want to know. And that's what the next question is going to be. It's not going to be questions that would go to the issues that you've raised in the other lawsuit about consent, duress, et cetera, et cetera, et cetera. I've already asked him about that in the other lawsuit.

MR. GREENE: Go ahead and pose your question. I'll make my objection if I deem it fit.

MR. WILSON: All right, good.

Q. Can you tell me what did you do with the $518,000?

MR. GREENE: As to that, I will object. It's irrelevant. It's beyond the scope of the complaint. Complaint alleges that Armstrong developed his so-called fraudulent scheme and the intent to execute that in 1990. We're in 1986;

it's irrelevant.

MR. WILSON: I want to know what he had in 1990 and --

MR. GREENE: Well, ask him.

MR. WILSON: Well, I can ask him that or I can try to find out what he had in 1990 by going back prior to that.

MR. GREENE: I object on the grounds stated.

MR. WILSON: Go ahead. I think you can rule on it.

MR. BENZ: Okay. I'll sustain the objection as to detailed questions as to what happened to assets. Again, as to what he had at the time of the so-called transfers, is fine. It's certainly relevant. While this may be one approach to it, it's also an invasion of privacy and I think there are other ways to get there.

MR. WILSON: All right.

Q. Then let's just go to 1990, and why don't you tell me what you had in 1990, what were your assets in 1990?

A. Cash, stock, personal effects.

Q. All right. Well, thank you. Can you tell me what how much cash did you have, let's say January of 1990?

A. I have no recollection.

Q. None at all?

A. No, I had some.

Q. No. I mean you had no recollection of how much you had?

A. That's correct.

Q. All right.

A. I mean other than what I've already testified to.

Q. If I ask you how much cash you had in January of 1990, you don't have any idea; is that right?

A. Uh-huh.

MR. WILSON: All right. Then I think I ought to be able to go back and ask him what happened to the money because he doesn't remember what he had in 1990.

THE WITNESS: I already told you what happened, what happened to the money. I've told you in detail. I've told you every, every possible thing that you could possibly get. There aren't, there isn't anything more than what you have.

MR. WILSON: So now you're telling

me that the --

THE WITNESS: There it is.

MR. WILSON: The day of the so-called fraudulent conveyances, August 1990.

THE WITNESS: You now know every debt that I forgave. You know where all the stock went. You have my declaration, which is a sworn declaration which lays it out in such detail you can't believe. Now give it your best shot, prove your case. You haven't got a case.

BY MR. WILSON:

Q. Well, we'll be out of here a lot sooner if you just answer whatever I ask you.

A. Don't ask so many questions. We could leave right now.

Q. The questions that I asked you previously, which you, and when you gave me the list of people that owed you money, that's all as of August of 1990; is that right?

A. Correct.

Q. All right. How long had those loans been outstanding approximately, how long had the loan to Jerry Solfvin been outstanding?

A. Could have been a year, I'm not sure.

Q. And the one to Mr. Walton?

A. Couple of years.

Q. Okay.

A. Maybe three.

Q. Two or three years, would that be a good estimate?

A. Uh-huh.

Q. And the one to the Dawsons?

A. Maybe a couple of years.

Q. And the one to the Douglases?

A. I guess from -- although it changed as we went through the property transfer matter, there had been some, some debt which had existed since '87.

Q. Okay. All right. Now, in August of 1990 what was your relationship with the Church of Scientology, if any?

MR. GREENE: Objection, vague.

MR. WILSON: I don't think --

THE WITNESS: I was considered a suppressive person, an enemy, fair game.

BY MR. WILSON:

Q. Okay. And that's your understanding of how you were considered by the church; is that right?

break?

THE WITNESS: Yes.

MR. WILSON: I guess we're taking a break now.

(Recess taken.)

MR. WILSON: What was the last question?

(Record read.)

THE WITNESS: Well, this was in the beginning of August, and the crisis in the Middle East began to develop and I sensed that it was a very serious matter. And I guess really, inside Scientology I was something of a -- for the organization, I was something of a rebel inside and I had begun to develop my own mind independent of Scientology and began to think things through myself.

And then when I left the organization, I continued on in that direction and I want, I guess I, you know, I've had a concern for a long time about the state of the world. And I also had begun to pursue a relationship with God. And when this buildup began to happen and, you know, I watched it like most of the people in this country did on television day after day.

And being concerned, I asked what I could do or what I should do, what was wanted of me. I had already begun to understand the concept of guidance and I had already, even prior to '86, back in '84, I had considered that I could communicate with God and that we had dialogue sometimes and I was able to dialogue by writing.

And so at this time, as I sometimes will do, I asked for guidance. And the message that I got was to give everything away. Take only what I need. And I didn't know what that really meant in life at the time, but as I began to meditate on that, I began to understand how that really did apply to me. And it was at that time that it came to me that I would forgive all the debts that were owed to me and that I would take only what I needed.

And I was at that time occupying the house with Mr. Walton and I had a commitment to him because I had, you know, essentially brought him up to Marin County from Southern California. And I had, I wanted to carry through on my commitment to him and make good on that promise so that, that really was why I ended up conveying the house to him.

And I also was, as you know, the owner of the, all the stock in my corporation at that time which I had, I had developed some things.

But it really existed as a sort of a future commercial hope at that time, and I had transferred all of my writings and drawings and stuff to the corporation in '88 and had maintained it into this time in 1990. And I wanted to. That was a major asset to me, and I thought at that time that I would give that to four of my very good friends in in the hope that they could or would do with it whatever they wanted and it could be commercially viable for all of them and a lot of fun.

And so I didn't know about all the details at the time, but I knew that, the broad concept, and so I did, I went ahead on the basis of that conviction that I could do something in life.

And then I did, as you know, I wrote a series of articles or essays or letters regarding the Middle East crisis as it built up. And being unencumbered, I also offered, offered myself at that time -- and this was something that, this was not -- that aspect of it was not an original I had at that time, because I had done the same thing some years before. So it wasn't -- in a sense it was, you know, precipitated by the Middle East crisis and in a sense it was just a logical progression and logical place that I came to after everything else in my life had happened. And I mean, there's no doubt in my mind that I have been, I guess, both affected by my life with Scientology and just who I am.

MR. WILSON: All right. Mark this, would you please?

THE WITNESS: And I guess too, you know, I really -- I think about things that -- and you can probably know from the thought that I've given money through the last many years, that I recognize its intrinsic valuelessness. So that was, you know, that had to kind of be in place in order for everything else to happen.

But that's, that's an aspect of it. And, you know, I have, I've not -- I really believe, even though it's hard to see and although sometimes it's difficult to continue to exist, I think that all of my decisions along the way evidence in fact guidance, and that I could not have done it. I can't do this. I mean, I, you guys beat me a long time ago.

MR. WILSON: Could you mark this, please?

(Whereupon, Exhibit No. 1 was marked for identification.)

MR. WILSON: Marked as Exhibit 1, I only have two copies but I'll -- can you share one?

MR. WALTON: I'll look at his.

MR. WILSON: Can you share with Gerry?

MR. GREENE: Fortunately, it's not important.

MR. WILSON: It's not exactly a major document here.

Q. Could you identify what's been marked as Exhibit 1?

A. Yes.

Q. What is that please? Is that your handwriting?

A. Yes.

Q. Okay.

A. And that was when, that's sometimes how messages come to me and that's how that one came to me and so it's a dialogue. Those are my words. And of His words.

Q. By His words, you mean God's words?

A. Uh-uh.

Q. God's words are keep nothing, give what you have to the poor and take only what you need?

A. Yes.

Q. And so in giving away your assets, you were following what God was telling you to do; is that basically yes?

A. Uh-huh.

MR. GREENE: Please answer audibly, Gerry.

MR. WILSON: And you shouldn't have waived all those admonitions, Ford, and maybe he wouldn't have done that.

Q. Now, so you basically kept nothing; is that right?

A. Right.

Q. You gave everything to the poor?

A. Yes.

Q. So that means that you considered Mr. Walton to be poor at the time?

A. Uh-huh. I, you know, that -- I, myself asked that at the time, and when I looked around at all of the people who were the recipients of this, I saw that there wasn't any other way to do it. That that was the logical way and that has been borne out in truth.

Q. Did you --

A. Of people, a person should own where he lives and that's where Michael Walton lives. Michael Walton has a family now in that house, and that's where the family should be.

Q. He didn't have a family then?

A. I don't live there.

Q. He didn't have a family then; is that right?

A. Well, he, I mean he did, but --

Q. What was --

A. But the family had a somewhat different configuration at this time.

Q. What was Mr. Walton's family in 1990?

MR. WALTON: I'm going to object to that. I think it's irrelevant and I think it invades my privacy. It has nothing to do with the fraudulent transfers or allegations of fraudulent transfers.

MR. WILSON: I'll withdraw that question.

Q. What made you think that Mr. Walton

was poor in 1990?

A. Because he had a need and he was in debt and he, in my opinion at the time, I think that it was essentially a help. It took care of my promise to him and it gave him the opportunity to build a career from that point forward.

Q. Okay.

A. And to take care of his family. And in truth, he really is the person who should be there. I mean, I had a flash of it when I considered initially buying the house, but I get all sorts of flashes of things.

Q. Okay. Now let me just ask you in addition to the house and the forgiveness of the debt, what else did you give to Mr. Walton?

A. I think there were some, there were some house things which I had owned individually.

Q. You mean that --

A. There was a table that was in the house.

Q. Furniture?

A. Furniture, and that sort of thing.

Q. Was there a joint account you had with Mr. Walton at that time?

A. Yes.

Q. And you gave what was in that to Mr. Walton; is that right?

A. Correct.

Q. How much money was in that, as far as you remember?

A. There may have been 35, $40,000. I'm not sure.

Q. And where was that joint account maintained, what bank?

A. West American Bank.

Q. What branch?

A. San Anselmo.

Q. Okay. Did you give Mr. Walton anything else that you haven't just told me about?

A. Share in the company, in the corporation.

Q. Right, I'm sorry, I forgot that. In addition to this, anything else?

A. No.

Q. So it was the house, whatever -- some furniture in the house, joint account, and one share of TGAC?

MR. GREENE: And the debt.

MR. WILSON: And forgiving the debt.

THE WITNESS: Yes.

BY MR. WILSON:

Q. Is that right?

A. Uh-huh.

Q. Okay. Did you consider at the time giving any of your assets to any charitable organizations?

A. I considered.

Q. Why did you not give it to a charitable organization, if there was a reason?

A. I wasn't guided to.

Q. When you say guided, you mean guided by God; is that right?

A. Right.

Q. So you're -- essentially, you were guided to give the assets by God to whatever you gave it to; is that right?

A. Uh-huh.

MR. GREENE: You've got to say yes or no.

MR. WALTON: Is that yes?

THE WITNESS: Yes.

BY MR. WILSON:

Q. Thank you. Now, in addition to -- we've already gone through some of this, and I don't want to go through it again, I think I can do it with just a couple of questions as to these other people, the Dawsons, the Douglases, and Jerry Solfvin. When you forgave the debt, in your mind that was giving away an asset; is that right?

A. Well, I didn't, I thought of it as forgiving a debt.

Q. Okay.

A. So if that's -- I mean --

Q. Okay.

A. -- it's an asset, I suppose.

Q. Were you guided to do this as well?

A. Uh-huh.

Q. Okay.

MR. WALTON: Yes?

THE WITNESS: Yes.

BY MR. WILSON:

Q. For the same reasons that you've just told us about for Mr. Walton; is that right?

A. Yes.

Q. Okay. In addition to forgiving the debt, did you give Jerry Solfvin anything else?

A. No.

Q. In addition to forgiving the debt, did you give the Douglases anything else?

A. I got a share of the stock.

Q. In addition to that, did you give them anything else?

A. I don't believe so.

Q. Okay. And the Dawson family in Massachusetts, in addition to forgiving the debt, did you give them anything else?

A. No.

Q. Okay. At the time of the, in August of 1990, how would you characterize your relationship with Mr. Walton?

A. We were friends and he also represented me in the appeal in Armstrong 1. And we had a prospective business relationship regarding artistic or creative ventures.

Q. Okay. What was your relationship with Michael Douglas in August of 1990?

A. Friends.

Q. That's it?

A. (Witness nods head.)

Q. And is Kim Douglas's wife?

A. Yes.

Q. They were just friends. How often did you see them socially?

A. Maybe once a month.

Q. Okay. How about in August of 1990,

did you give Bambi Sparks anything?

A. Uh-huh.

Q. What did you give her?

A. I gave her a share of the corporation and I gave her my car and I gave her her home furnishings.

Q. Anything else?

A. Gave her some cash.

Q. How much cash did you give her?

A. I think it was like 1500 bucks or something like that.

Q. What kind of car did you give her?

A. It's an '87 Toyota.

Q. All right. And what was your relationship with her at the time, friends?

A. Friends.

Q. Did you use the car after you gave it to her?

A. Uh-huh. We continued to hang out together and she ended up not taking it but giving it back.

Q. Then what did you do with it?

A. I still drive it.

Q. Okay. Who is Andrew Armstrong?

A. He's my brother.

Q. You gave him a share of stock in TGAC?

A. No.

Q. Did you give him anything?

A. No.

Q. Did he ever buy stock in TGAC?

A. Yes. Oh, wait, no. He's -- you can add him to that list, I guess.

Q. Which one?

A. He -- the list of people who owed me.

Q. Okay.

A. Owed me money.

Q. How much did he owe you?

A. I think, I think it was 12,000. Something like that.

Q. All right. And you forgave that debt in August of 1990?

A. Right.

Q. All right. And where does he live?

A. Somewhere around Denver, Colorado.

Q. Okay. Who is Thomas McPherson?

A. He's a friend of mine.

Q. Does he own any shares in TGAC?

A. Yes.

Q. Did he buy those shares?

A. Yes.

Q. Did you give him anything in August of 1990?

A. No.

Q. Did you give him anything before August of 1990?

A. No.

Q. Did he ever owe you any money?

A. No.

Q. All right. Who is Michael Dick?

A. He's a friend of mine.

Q. He owns a share in TGAC?

A. Yes.

Q. Did he ever owe you any money?

A. No.

Q. Did you ever give him any assets?

A. No.

Q. All right. How about Trevor Dick?

A. That's a friend and he owns a share of TGAC, he and his brother Colin.

Q. Okay. Now you're going to save me some time. So did you ever, did he or his brother Colin ever owe you any money?

A. No.

Q. Forgive or forget any obligations they had to you?

A. No.

Q. Did you ever give them any of your assets?

A. No.

Q. How about Anthony Armstrong; is he your brother?

A. Yes.

Q. Did he ever owe you any money?

A. No.

Q. He owns a share of TGAC?

A. Yes.

Q. Did you ever give him any assets?

A. No.

Q. Okay. Now, can you tell me with respect to TGAC what assets you gave to TGAC when you gave them to them?

A. I gave, I gave the corporation my writings, my drawings, up to 1988, and my office equipment and that sort of stuff.

Q. Okay. Did they, did TGAC give you anything in return for that?

A. They gave me a hundred percent ownership.

Q. Of the corporation?

A. Right.

Q. All right. So you basically transferred your assets or those assets to the corporation and you got all the stock?

A. Right.

Q. And then eventually the stock ended up with the people I've just asked you about, the Armstrong -- McPherson, Michael Dick, Trevor Dick, Colin Dick, Anthony Armstrong, the Douglases and Mr. Laff; (phonetic) is that right?

A. Well, I'm not sure what you mean by eventually, but at one time the stock was owned completely by Michael Walton, Michael Douglas, Lorien Phippeny and Nancy Roads. Subsequently the corporation sold some stock and subsequently, those four majority shareholders gave back to me a majority stock.

Q. So do you, how much of TGAC stock do you hold today?

A. Eighty percent.

Q. And Lorien Phippeny owns no shares today; is that right?

A. Correct.

Q. Who is she, by the way?

A. She's a friend.

Q. Okay. Did you give her any assets in August of 1990?

A. I've already told you she's the same as --

Q. That's Bambi Sparks?

A. Right.

Q. All right. Nancy Roads, did you give her anything in August of 1990?

A. Those shares of sock.

Q. That's it?

A. Correct.

Q. Nothing else. And you reacquired that 80 percent ownership of TGAC by gift from those people that you mentioned; is that right?

A. Correct.

Q. And that's, did each of those individuals, before giving it to you, own 20 percent; is that what it was?

A. Correct.

Q. Each owned one share?

A. Well, there was a stock split and what was one share got divided up into a hundred.

Q. So --

A. And so they each own 25.

STATE OF CALIFORNIA)

) SS

COUNTY OF SONOMA)

I, SHEENAGH M. CARLSON, holding CSR License Number 8350, hereby certify that, pursuant to Notice to take the foregoing deposition, said witness was by me duly sworn to tell the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place stated herein; that the testimony of the said witness was recorded by me by stenotype, and that the said deposition was under my direction thereafter reduced to computer transcript and, when completed, was available to said witness for signature before any Notary Public,

I further certify that I am not of counsel or attorney for either of the parties to said depositi nor in any way interested in the outcome of the cau named in the caption.

IN WITNESS WHEREOF, I have hereunto set my hand this day of Tuesday, March 29th, 1994.

csr

Sheenagh M. Carlson, CSR 8350
Certified Shorthand Reporter.

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

--oOo--

CERTIFIED COPY

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

No. 157 680

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION, a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

______________________________/

DEPOSITION OF

MICHAEL L. WALTON

FRIDAY, MARCH 18, 1994

202261

REPORTED BY: JOANNE M. FARRELL, CSR NO. 4838 can think of.

Q. Okay. At the time, beginning of 1990, had Mr. Armstrong loaned you any money?

A. Yes.

Q. How much was your debt to Mr. Armstrong just prior to this house deal?

A. Something less than 30,000.

MR. GREENE: Excuse me, could you -- I'm a little -- strike that.

It's unclear what the time frame is, so I'd object on the basis of ambiguity.

MR. WILSON: Early 1990.

THE WITNESS: Somewhere just under $30,000. I had borrowed 30,000 -- I borrowed 25 and then another 5, probably in 1987, '86, '87, something like that, and had paid back not a lot of it, a couple thousand dollars or something.

MR. WILSON: Q. Were these loans evidenced by promissory notes?

A. One was.

Q. Which one?

A. The 25,000.

Q. Do you know where the copy of that note is today?

A. I know where the original is.

support the house for a year, because that's what it was for.

Q. Okay. So I take it that you didn't really give him any legal advice with respect to giving his assets away; is that right?

A. No, I didn't.

Q. And you first learned about his plan to give away most of his assets sometime in the summer of 1990; is that accurate?

A. Yes; July or August.

Q. And you learned about that because he told you?

A. Yes.

Q. Was this something that he mentioned before, or did this pretty much just come up in the summer of 1990?

A. Giving away his assets?

Q. Yes.

A. It came up for the first time, as far as I knew, in 1990, the summer, for me.

Q. And your first discussions about it would have been that time frame; is that right?

A. Yes.

Q. Did he tell you that he wanted to give all of his money to the poor? Did he ever make that statement to you?

A. Not that I recall.

Q. Okay. Did he ever tell you what his intentions were with regard to this, why was he doing it?

A. Yes, he did.

Q. What did he say?

A. He said a number of things to me. I'm trying to separate what I know now from what he said yesterday at the deposition from what he specifically told me at that time. Basically, that it was right to do; he was guided to do it.

And over the course of time, I think I told you this last time you took my deposition, I questioned him at some length when I determined that he was really serious to try to find out what was going on.

I have known Gerry to become especially depressed during some of this Scientology litigation over the past 15, 14 years, has it been, 14 years, and quite frankly, when he told me he was going to do this, I was afraid he was going to kill himself.

So I questioned him at some length to make sure that this was something that was a positive thing for him and not something that was a negative thing. My initial response when he told me was fear. I was afraid for Gerry.

Upon pressing, upon further conversations over the course of, I suppose, about two weeks, Gerry told me that it was really something that had come to him from God. And when he told me, it was a positive, pleasant experience that he seemed to be portraying. I felt much comforted and after that, I didn't ask him much more about it.

Q. Okay. What did he give you?

A. He gave me whatever interest he had in the house at that time; he gave me a kitchen table; and I'm not sure about the ladder.

Q. Okay. And what about the debt, did he forgive the debt?

A. Forgave the debt.

Q. That was at that time?

A. Right.

Q. Were there any documents executed to show the forgiveness of the debt?

A. Yes.

Q. What?

A. There was the return of the original note with some forgiving language. I don't remember what the language was. It was basically something prepared by the CPA.

Q. That's the note that you referred to earlier that you have?

A. Yes.

Q. The $25,000 note?

A. Yes.

Q. The $5,000 debt was not evidenced by a note?

A. No.

Q. He just told you he was going to forgive that?

A. Yes.

Q. Was there any document that evidences that forgiveness?

A. No.

Q. And he transferred to you, in addition, the house account; is that right?

A. He transferred control. And I say that sort of strangely because I had control, anyway. Both of our names were on the account to begin with; that was part of the deal. I was fully entitled to write checks against the account at any time. And the only thing he really did was say he wasn't going to write anymore checks on the account.

Q. Okay. And then he wanted to be repaid from that account for monies spent on the house for certain specific items; is that right?

A. Yes.

Q. His rationale for that was he wanted to do what?

A. I don't know what -- I mean, I don't know what he was thinking about. But I wasn't surprised.

Q. All right. Did you prepare any documents? Did you prepare the forgiveness document?

A. No.

Q. Did you prepare the deed from yourself and Mr. Armstrong as co-tenants to yourself with respect to the house?

A. I think I did.

Q. Did you prepare any other documents to evidence the gifts that he was making to you?

A. Not that I recall.

Q. Did you ever tell Mr. Armstrong that he should get a lawyer other than you to represent him in these transactions?

MR. GREENE: Objection. That is

CERTIFICATE OF REPORTER

I, the undersigned, a Certified Shorthand Reporter of the State of California, hereby certify that the witness in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein stated; that the testimony of said witness was reported by me, a Certified Shorthand Reporter and disinterested person, and was thereafter transcribed under my direction into typewriting; that the foregoing is a full, complete and true record of said testimony; and that the witness was given an opportunity to read and, if necessary, correct said deposition and to subscribe the same.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing deposition and caption named, nor in any way interested in the outcome of the cause named in said action.

IN WITNESS WHEREOF, I have hereunder set my hand and affixed my signature this______day of MAR 2 8 1994, 19___

CERTIFIED SHORTHAND REPORTER
STATE OF CALIFORNIA

8-20-90

7257

Dear Andy:

By this letter you and Marilyn are forgiven any debt of any kind you may have considered you owed me. I know it doesn't immediately change things for you, but I hope it will bring you relief in some corner of your mind.

I still am planning to make my way to Colorado in mid September, so let me know if this works with your plans. I'd love to run your mountains.

I'll be leaving this

②

place soon, although The Gerald Armstrong Corporation will continue~~d~~ to be headquartered here, and for now this will remain my personal mailing address. I hope to be in B.C. around Labor Day. I have a lot of hopes don't I. I also have a lot of hopes and good wishes for you guys.

Love

Gerry

8-20-80

Dear Lorrie:

I'm not certain what either you or I consider you owe me, but whatever it is I am by this letter forgiving it.

I was happy to help you get your sweet little car, and happy to get all those c-notes all this while, which always arrived exactly when a hundred dollars meant everything. And

②

happy to count you
among my dearest
friends.

7260

Love
Gerry

20-90

Dear Jerry:

The purpose of this letter is to forgive you of any indebtedness you consider you have to me.

I am aware that it was very difficult to make payments to me, and I am grateful for the payments you did make because they helped me as I hope to help you.

You and Sharon and all your family have always made me, and everyone, welcome in your home.

(2.)

(ital) I was going to bed, but now I'm going to work.

Hallelujah!

Gerry

8-[illegible]1-90

Dear Bruce, Tricia and Anne-Leigh:

It is my desire to forgive you by this letter any debt you may consider you owe me. Please let me know if in that regard you want me to execute any other document.

I was happy to help you when I could, and I know you were happy to help me when you could.

I hope I get to see you all again. And

I hope you'll laugh

Love to everyone!

Gerry

8-21-90

Dear Michael and Kima

With this letter I am forgiving you any indebtedness you may consider you have to me.

You both have been a great help to me in many ways for many years and I will be eternally grateful.

the Whynot Group can become a sole proprietorship by expeditious execution.

I will pick up the few things I've left at your home and finish off the few things I've left undone, I hope, in the next short time.

Love to you both.

Gerry

1-18-90

7267

6838 Charing Cross Road
Berkeley, CA 94705

Thursday, September 6, 1990

Dear Gerry,

Hope this letter finds you back from your Canadian adventure, safe, sound, and of good cheer!

I wanted to write and thank you for what, viewed from one angle (as in: mine) is a stunning act of generosity--your having forgiven us for any indebtedness, and invested me as shareholder in TGAC. This follows on the heels of several acts of generosity which have been absolutely key factors in our financial situation being as happy as it is today. For all this, and the many other gifts you have bestowed upon us--chiefly your friendship--we too are eternally grateful. I am often mindful of your generosity as I meet with opportunities to lend a helping hand to other folks. There's no end, I guess.

As we discussed earlier, there is still some paperwork left to do in order to tie all the ends up to the satisfaction of the bureaucratic / legal world. This will be an opportunity (of which I hope there will be many) for us to get together one of these days.

I am in touch with Michael Walton concerning TGAC (I just realized yesterday that it's pronounced tee-gee-ack!) and am sure more history will be forthcoming on that front.

As to "finishing off the few things you've left undone", as far as I'm concerned, you can certainly stand down as concerns details on this Charing Cross house. If you'll just point out where you've left off on coating the decks with anti-rot goo, I'll be happy to take over on that and anything else around here.

Love,

Michael

Dear Gerry,

THANK YOU FOR YOUR GREAT KINDNESS IT IS TRULY WONDROUS I WISH YOU GREAT JOY IN YOUR CHOSEN PATH I HOPE IT MAKES you Happy "Beyond your" Wildest Dreams

I Thank you For All The Times you Listened to me and Heard me.

Life Has some Strange Turns to it. I see you at the PR Desk in The Forward Tween Decks, getting married to Tommy. At SHQ talking about getting the Furniture Done. I see you with Jassy at Jim's party. In L.A at the Bonaventure in Court. Talking to you about Nancy you Dancing at Laurels Wedding — So now where to ...

....

My House is your House in All ways — May the Gods Take Care of you. May the Winds of Time Keep you Safely

Much Love

PROMISSORY NOTE

For value received, the undersigned promises to pay to Gerald David Armstrong the principal sum of $29,245.53 (twenty-nine thousand two-hundred forty-five dollars and fifty-three cents). Terms: The undersigned shall make principal and interest payments of $29,245.53 on Gerald David Armstrong's behalf toward his half-portion of the $159,600.00 trust deed and note secured by 7140 Buckingham Blvd, Oakland, California 94705 - this in addition to principal and interest payments on undersigned's half portion of the same trust deed and note (beneficiary of said trust deed and note is Fidelity Federal Savings and Loan Association.) Should Gerald David Armstrong and the undersigned agree mutually to sell the above mentioned real property, the undersigned agrees to pay Armstrong any remaining principal, out of escrow proceeds. The interest rate on this promissory note shall be the same rate as the above mentioned trust deed and note, which is a variable rate loan.

Michael E. Douglas — 7-28-87

Michael Edward Douglas — date

Kima E. Douglas — 7-28-87

Kima Elizabeth Douglas — date

this debt is on this date forgiven as a gift Aug 30 1990

G. Arm

PROMISSORY NOTE

For value received, the undersigned promise to pay to Gerald David Armstrong the principal sum of $66,988.48 (sixty-six thousand, nine hundred eighty-eight dollars and forty-eight cents), in monthly installments of $719.86, or more, principal and interest, at an annual interest rate of 10%. The note shall run from June 1, 1988, with the first payment due July 1, 1988, and the last payment due on or before June 1, 2003.

All parties hereto agree that this note supercedes and voids the previous note in the principal amount of $29,245.53, dated July 28, 1987, in which Michael Edward Douglas and Kima Elizabeth Douglas were the payor, and Gerald David Armstrong was the payee.

Michael Edward Douglas 6-3-88
Michael Edward Douglas Date

Kima Elizabeth Douglas 6-3-88
Kima Elizabeth Douglas Date

Gerald David Armstrong Date

This debt is on
this date forgiven
as a gift.
Aug 30, 1990
G. Arm

6-8-9

DO NOT DESTROY T OTE: When paid, this note, if secured by Deed o st, must be surrendered to Trustee for cancellation, before reconveyance will be made.

7271

PROMISSORY NOTE

(STRAIGHT)

(INCLUDING ACCELERATION CLAUSE)

$ $10,000.00 Berkeley, California, June 1, 19 90

Six months after date, for value received

Michael E. Douglas and Kima E. Douglas

promise to pay to Gerald David Armstrong

or order at such place as holder may designate the sum of

Ten thousand Dollars Dollars

with interest from June 1, 1990 until paid, at the rate of

ten (10) percent per annum; payable ALL DUE AND PAYABLE DECEMBER 1, 1990

Should interest not be so paid it shall thereafter bear like interest as the principal. Should default be made in payment of interest when due the whole sum of principal and interest shall become immediately due, at the option of the holder of this note. Principal and interest payable in lawful money of the United States. If action be instituted on this note, I promise to pay such sum as the Court may fix as attorney's fees. This note is secured by a DEED OF TRUST.

This debt is on this date forgiven as a gift.

Aug 30, 1990 G.

If the trustors shall sell, convey or alienate said property or any part thereof or any interest therein, or shall be divested of their title in any manner or way, whether voluntarily or involuntarily, any indebtedness or obligation secured hereby, irrespective of the maturity date expressed in any note evidencing the same, at the option of the holder hereof and without demand or notice, shall immediately become due and payable.

Michael E.

Kima Douglas

FORM 2 - (SF)

7272

DO NOT DESTROY THIS NOTE: When paid, this note, with Deed of Trust securing same, must be surrendered to Trustee for cancellation, before reconveyance will be made.

FORM 8

NOTE SECURED BY DEED OF TRUST

(STRAIGHT NOTE)

$ 66,988.48 Berkeley, California, June 1 19 88

Fifteen years after date,
for value received, Michael E. Douglas and Kima E. Douglas
promise to pay to Gerald David Armstrong
or order, at such place as holder may designate the sum of
Sixty-six thousand nine hundred eighty-eight and 48/100 DOLLARS
in Lawful Money of the United States, with interest thereon in like Lawful Money from June 1, 1988
until paid, at the rate of ten (10) per cent per annum, payable
$719.86, principal plus interest, monthly.

Should interest not be so paid it shall thereafter bear like interest as the principal. Should default be made in payment of interest when due the whole sum of principal and interest shall become immediately due at the option of the holder of this note. If action be instituted on this note the undersigned promise...... to pay such sum as the Court may fix as attorney's fees. This note is secured by a Deed of Trust of even date herewith.

this debt is on this date forgiven as a gift Aug. 30, 1990 G. Arm

Michael E. Douglas

Kima E. Douglas

WESTERN TITLE GUARANTY COMPANY ALAMEDA COUNTY DIVISION

FEB 2 8 1990
EA

APPEAL - SECOND DIST.
ILED
EB 28 1990
N. WILSON Clerk
Deputy Clerk

ORIGINAL

7273

MAR - 9 1990

Permission to file respondent's brief GRANTED
Time to file respondent's brief extended to 60 days after date of this order.

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

SECOND APPELLATE DISTRICT

DIVISION THREE

CHURCH OF SCIENTOLOGY OF CALIFORNIA, et al.,	Case No. B025920
Plaintiffs-Appellants,	LASC No. C420153
v.	
GERALD ARMSTRONG,	RESPONDENT'S PETITION FOR PERMISSION TO FILE RESPONSE AND FOR AN EXTENSION OF TIME TO FILE RESPONSE
Defendant-Respondent	
MARY SUE HUBBARD	
Intervenor.	

3-22-90

I am the respondent Gerald Armstrong. I am petitioning this court at this time for permission to file a respondent's brief in this appeal and for an extension of time in which to file a respondent's brief or other appropriate document.

1. Permission to File:

The unusual need for this court's permission to file a respondent's brief arises from a condition contained in a document entitled MUTUAL RELEASE OF ALL CLAIMS AND SETTLEMENT AGREEMENT signed by me December 6, 1986, a copy of which is attached hereto in a sealed envelope as Exhibit A. I have no objection to this document being unsealed.

Para. 4A of the settlement agreement allowed appellants to maintain their appeal, no. B005912, which had been filed in 1984, although the case was ostensibly settled. Para. 4B contains the condition that I "waive any rights [I] may have to oppose (by responding brief or any other means) any further appeals taken by the Church of Scientology of California."

I have recently become convinced that it would be a fraud upon this court to not advise it that the respondent is prohibited from filing a brief. I am also now convinced that my right to file a respondent's brief is not something that can be taken away by such a settlement agreement.

I have discovered, moreover, that "the failure to file respondent's brief imposes an unnecessary burden on [the] court, and at least raises the inference that respondent concedes that the appeal is meritorious," Sowell v Sowell, 164 Cal. App. 2d 371, 330 P.2d 391 (1958), Yarbrough v. Yarbrough, 144 Cal. App. 2d 610, 301 P. 2d 426 (1956); that the court "may assume . . . that the respondent has abandoned any attempt to support the judgment, and . . . may also assume that the points made by the appellant are meritorious," Roth v. Keene, 256 Cal. App. 2d 725, 64 Cal. Rptr. 399 (1967); and that the court "shall regard with disfavor the failure of a respondent in any case to assist the court by means of an answering brief," James v James, 125 Cal. App. 2d, 417, 270 P.2d, 538 (1954).

I am therefore requesting this court's permission to file a respondent's brief, motion for dismissal or other responsive document.

2. Extension of Time to File:

I received Appellants' Brief and Appellants' Supplemental Appendix in Lieu of Clerk's Transcript from Flynn, Sheridan & Tabb on January 18, 1990. I have not yet received Appellants' Appendix.

I am not an attorney and I am not represented by legal counsel in any Scientology matters at this time. Neither Flynn, Sheridan & Tabb nor Contos & Bunch, both of which firms represented me throughout the litigation of this case in the lower court, will be representing me in this appeal. It is my intention to retain an attorney to represent me in this appeal if at all possible.

Appellants had five and a half years from the date the trial court issued its Decision to the date they filed their brief.

Appellants have filed another appeal, entitled Church of Scientology of California and Mary Sue Hubbard, Appellants, against Gerald Armstrong, Defendant, Bent Corydon, Appellee,Civ. No. B 038975 in Division Four in the Second Appellate District, which has its genesis in the same case underlying this appeal, Super. Ct. No. C420153, and concerns many of the same facts and issues as this appeal. I am at this time also petitioning the Division Four Court for permission to respond in that appeal.

There remain a number of issues springing from the settlement agreement, appellants' actions in violation of the agreement, and appellants' obstructive and threatening use of the agreement, which this court does not have to consider in order to grant my petition, but which I will be addressing as soon as possible by motion or other appropriate action in the Los Angeles Superior Court, which retains, pursuant to clause 20 of the settlement agreement, jurisdiction to enforce its terms.

I therefore request 90 days from the date of this court's granting of this petition in which to file a respondent's brief or other responsive document.

DATED: February 20, 1990

Respectfully submitted,

GERALD ARMSTRONG

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF ALAMEDA)

I am employed in the County of Alameda, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business adress is 7140 Buckingham Blvd., Berkeley, CA 90475.

On February 20, 1990 I caused to be served the foregoing document described as RESPONDENT'S PETITION TO FILE RESPONSE AND FOR AN EXTENSION OF TIME TO FILE RESPONSE on interested parties in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at Oakland, California, addressed to the persons and addresses specified on the service list attached.

Executed on February 20, 1990 at Oakland, California.

____

SERVICE LIST

COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT
DIVISION THREE
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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

---oOo---

COPY

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHALE WALTON; THE GERALD ARMSTRONG CORPORATION, a California for profit corporation; DOES 1 through 100, inclusive,

Defendants.

AND RELATED CROSS-ACTION.

NO. 157-680

DEPOSITION OF:

LYNN R. FARNY

Monday, July 11, 1994

VOLUME I

Reported by:
PENNY L. GILMORE
CSR NO. 4724

PENNY L. GILMORE & ASSOCIATES
DEPOSITION REPORTERS
P.O. BOX 862
ROSS, CALIFORNIA 94957
(415) 457-7899

Q. How long have you been secretary?

A. June 1988.

Q. Have you held any other position in the organization? When I say "the organization," I'm talking about the organization that filed the lawsuit in this litigation. Do you understand that?

A. Yes, I do.

Prior to my becoming secretary of the corporation for the Church of Scientology International I was an employee for approximately four years.

Q. Did your position as an employee involve you having any kind of title?

A. Yes.

Q. What were your titles starting from the first and progressing until the last?

A. The entire time I'm been with the Church of Scientology International I've worked in the legal department. I've had various job titles, some of which I don't remember, but they're all in the area of litigation working in either a paralegal capacity or as an executive over the department in which the paralegals work.

Q. How big is that department?

MR. MOXON: Objection. Which department?

MR. WALTON: The legal department.

MR. MOXON: Objection as to time. Now?

MR. WALTON: Q. What's the biggest it has been since you have worked in it? What's the maximum number of people in that department from the time you worked in it until now?

A. Approximately 50.

Q. Does that include lawyers?

A. No.

Q. What's the smallest that it's been?

MR. MOXON: I object to relevance. Is there some point as to how large or small the department is?

MR. WALTON: I think it may relate to the amount of experience that this witness has. This witness is here on behalf of the plaintiff and I'm going to be asking a lot of questions. I need to know if he's qualified. I'm looking at what his qualifications are.

MR. MOXON: Is there a particular qualification you are interested in?

MR. WALTON: I want to know what his experience is.

MR. MOXON: How large or how small the department is is irrelevant to how much experience he has.

MR. WALTON: I don't think so. I think if he's been working with 50 people, for example, he's been number two in charge of 50 people, that would indicate a lot of experience than if he's been working with one person and he's been the second in command.

Can we have a ruling?

MR. BENZ: I'm going to allow the question as to background.

THE WITNESS: Four.

MR. WALTON: Q. At the present time how large is it, just approximately?

A. Approximately 25 to 30.

Q. Do you have direct control, management control over any of these people?

A. Yes.

Q. How many?

A. Three.

Q. To whom do you answer? Who is your supervisor?

A. You want his name, is that what you are asking?

Q. Yes.

A. Ed Parkin, P-A-R-K-I-N.

Q. What is Mr. Parkin's title?

A. Legal activities chief.

Q. Mr. Farny, how many times have you had your deposition taken?

A. At least a dozen, but I'm not certain how many times.

Q. How many of those times in relationship to some Scientology litigation?

CERTIFICATE OF DEPOSITION OFFICER

I, PENNY L. GILMORE, duly authorized to administer oaths pursuant to Section 8211 of the California Code of Civil Procedure, do hereby certify that LYNN ROBERT FARNY, the witness in the foregoing deposition, was by me duly sworn to testify the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein stated, that the testimony of said witness was reported by me, a Certified Shorthand Reporter and a disinterested person, and was thereafter transcribed into computer-assisted transcription under my direction.

I futher certify that I am not of counsel or attorney for either or any of the parties in the foregoing depositon and caption named, nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of August 1994.

DEPOSITION OFFICER, CSR NO. 4724

I hereby certify this copy is a true and exact copy of the Original.

DEPOSITION OFFICER, CSR NO. 4724

7283

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

---oOo---

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHALE WALTON; THE GERALD ARMSTRONG CORPORATION, a California for profit corporation; DOES 1 through 100, inclusive,

Defendants.

AND RELATED CROSS-ACTION.

COPY

NO. 157-680

DEPOSITION OF:

LYNN R. FARNY

Tuesday, July 12, 1994

VOLUME II

Reported by:
PENNY L. GILMORE
CSR NO. 4724

PENNY L. GILMORE & ASSOCIATES
DEPOSITION REPORTERS
P.O. BOX 862
ROSS, CALIFORNIA 94957
(415) 457-7899

A. Certainly.

Q. What was that?

A. I had an ecclesiastical position; I didn't have any corporate position. I worked in the legal department since 1984.

Q. When you refer to your working in the legal department from '84 to '88 as holding an ecclesiastical position, would you define for me what you mean by your use of the term "ecclesiastic"?

A. A position that derives from -- sorry, that derives its authority, if you will, from the ecclesiastic organization of the Church as opposed to the corporate organization of the Church. The corporation as a corporation is organized with directors and officers; ecclesiastically we're organized otherwise.

Q. So the ecclesiastical organization is separate and distinct and apart from the corporate organization?

A. Except to the degree --

Q. First if you can agree give me a yes-or-no answer?

MS. BARTILSON: I'm going to object and ask you to let him finish answering the question before you interrupt. I think that was the ground rules yesterday.

THE WITNESS: Except to the degree of this -- and the answer is not going to offend you -- the people that occupy the corporate positions occupy similar ecclesiastic positions, so there's some relationship to it.

MR. GREENE: Q. Again, my question is that the ecclesiastical organization exists separate and apart from the corporate organization?

MS. BARTILSON: Objection, asked and answered. Answer it again.

THE WITNESS: Obviously you are dealing with the same group of people. There are parallel -- I think a better way of expressing it, there are parallel ecclesiastical and corporate organizations that are separate, but the part in the question I'm having difficulty with is "distinct." You are talking about the same Church. In other words, the Church of Scientology International is organized in an ecclesiastical fashion, and within those ecclesiastical positions certain individuals occupy corporate positions. To that degree they are separate, yes, but you are talking about the same entity.

Q. We're talking about CSI.

A. That's right.

Q. That's the corporation.

A. Mm-hmm.

Q. That's one subject matter that we're discussing.

A. Right.

Q. The other subject matter we're discussing is the subject matter of ecclesiastical authority.

A. Right.

Q. And there's commonalities between CSI and ecclesiasticalness but they're not identical, are they?

MS. BARTILSON: Objection, vague and ambiguous.

THE WITNESS: I don't exactly understand your question.

MR. GREENE: Q. Let me try to make it more clear.

A. Try it again.

Q. Yesterday, if my recollection is right, your testimony was that there are approximately 1400 Scientology-related organizations, right?

A. Yes, churches, missions and groups.

MR. WALTON: What?

THE WITNESS: Churches, missions and groups.

MR. WALTON: Am I the only one down here not hearing well?

MR. BENZ: I missed it the first time. I heard it the second time.

MR. GREENE: Q. So of those 1400 churches, missions and groups, CSI is one, correct?

A. That's also correct.

Q. Now isn't it true that there is ecclesiastical authority in place in each of those 1400 groups, if you know?

A. Ecclesiastical authority in place in each?

Q. Yes.

A. Each as its own separate unit or among them? That's what I don't understand about your question. I think it's largely irrelevant, though, because the answer is yes to both questions. I want to make sure which of those two questions you are asking.

Q. I'll keep asking my questions and we'll do our best to wend our way through this.

Where officers, directors and trustees of CSI have authority, that's defined according to the articles in the bylaws of CSI?

A. Right.

Q. They are also subject to authority that's derived from an ecclesiastical source, right?

A. Okay, I'll go along with that. All right.

Q. And the ecclesiastical source is the scripture of the Scientology religion; isn't that right?

A. That's also correct.

Q. And the scripture of the Scientology religion in part is derived from the writings of L. Ron Hubbard?

A. Correct. I would object to your

characterization of "in part." It is derived from the written and recorded spoken words of L. Ron Hubbard on the subjects of Dianetics and Scientology.

Q. Entirely?

A. Yes.

Q. So then is an accurate definition of your understanding of the use of the term scripture as used in Scientology, to define scripture as being the totality of the written -- of the writings and recordings of L. Ron Hubbard?

MS. BARTILSON: Objection, misstates the witness's testimony.

MR. GREENE: I'm asking if that's accurate.

THE WITNESS: No, that's not accurate.

MR. GREENE: Q. Then I misunderstood what you said. Tell me again. I'm sorry.

A. Scriptures of the Scientology religion are comprised of written and recorded words of L. Ron Hubbard on the subject of Dianetics and Scientology with the allowance that they may have been cancelled over the years or revised or modified, or whatever. On the subject of Dianetics and Scientology, what I had told you in the first answer was given allowances for any cancellations or revisions that may have been done over the years.

Q. That's part of -- Let me get a bigger picture first before I go more narrowly.

When you make the qualification on the subjects of Scientology and Dianetics, does that include writings on organizational administration?

A. That would not be included in the exception.

Q. I'm not focused on the exception; I'm focused on the scope of the meaning of scripture. So my question is is it included within the scope of the meaning of scripture L. Ron Hubbard's writings on administrative management?

A. Certainly, as it's used in the Church and as it's used in the Organization Executive Courses, First Volume, certainly that's considered scripture.

Q. You are a Scientology executive yourself; is that right?

A. That's correct.

Q. So you have gone through and received some amount of training in the organization executive courses, right?

A. Yes.

Q. Would you tell me what the extent of your training in that regard has been?

A. I've done the entire Organization Executive Course, which is the study of the encyclopedic volumes of Church policy as well as the Flag Executive Briefing

Course.

Q. And the OEC, Organization Executive Course books, those are the green ones?

A. That's correct.

Q. Now directing your attention to what's Bates-stamped as page 13 there's the enumeration of what the Mother Church has got to adhere to and there's a list of three items.

A. Yes.

Q. So part of what CSI's corporate mandate is is to adhere to the goals, tenets, doctrines, codes, creed, policies and practices set forth in the Scientology scriptures, right?

A. That's correct.

Q. And you yourself as an individual Scientology executive are bound by such things as well, correct?

A. Certainly in the performance of my duties, yes, of course.

Q. And also in the performance of -- I mean, you have given your life to Scientology, essentially, haven't you?

A. I've devoted my life to it, yeah. I think we're getting into the area of personal religious experience that's been excluded, but, yes, of course I have.

Q. That's been roughly since 1976, right?

A. Roughly.

Q. Now item two talks about recognition of the ecclesiastical authority of the hierarchy of the Mother Church, right?

A. That is what it says.

Q. Now making reference to the ecclesiastical authority that means, if I have understood you -- and I may not and I know you will correct me if I haven't -- that recognition is of the Scientology scriptures, right?

A. To be precise, the recognition is of the ecclesiastical authority of the hierarchy of the Mother Church but it flows, that authority flows from the scriptures, if that's what you are asking.

Q. That's a good starting point. Then the next point I want to go to is the phrase "hierarchy of the Mother Church." My first question is: The hierarchy to which that phrase makes reference, is that hierarchy contained within CSI?

A. That appears to be the most logical reading of point two, yeah.

Q. Let me ask you -- I know that it appears to be the reading --

A. It would --

Q. It appears that way to me, too.

A. It would match the way things work. So the

Q. And in some cases physically?

A. I don't recall receiving a physical order, but you are correct that orders can be issued that way.

Q. That's the scope of my universe. Is that the same as yours?

A. Ditto.

Q. So, then, when you receive an order, for such an order to be pursuant to policy that order has got to be in writing, doesn't it?

A. Policy contemplates the existence of verbal orders, so the answer to your question is no.

Q. Was the entire legal division of OSA affected by the reorganization?

A. Yes.

Q. How many people was that, approximately?

A. Thirty to 40.

Q. Now the action bureau of OSA contemplates the performance of what type of activities?

A. Sending representatives to local areas to assist them to resolve situations in that area either internally within the local Office of Special Affairs or Department of Special Affairs or externally.

Q. When such persons were sent out would that be called a mission?

A. It would.

Q. Would such persons performing such missions generally be members of the CMO?

A. No.

Q. Did you hold the post of civil litigation officer within OSA during the original Armstrong litigation?

A. You mean in 1984?

Q. That was when --

A. 1982 to 1984?

Q. Yes, '82 to '84.

A. No, I did not.

Q. Were you involved in the Armstrong litigation -- Actually, strike that.

What post did you hold in the '82 to '84 time period, post or posts?

A. It's plural. When the case was first filed and we obtained the temporary restraining order --

Q. Wait, wait, wait, I want --

A. I have to do it by what was happening. Do you want to do it by date?

Q. No, you can give me activity and sequence.

A. When the litigation was first filed I was in supercargo of the Office of Special Affairs, U.S.

MR. WALTON: I'm sorry, what?

THE WITNESS: Supercargo.

MR. GREENE: Q. That was your post?

A. Yes.

Q. So then what post next did you have?

A. Then August '82, August '82 I was on that position. I'm not sure -- no, it wasn't OCS; that was before the reorg was completed. It was U.S. Guardian's Office.

Q. So you were supercargo of the U.S. Guardian's Office in approximately August of '82?

A. That's correct. Then after the reorg I went into legal. That would have been January of '83 I went into legal in the mission all clear, and I held various positions within that until I moved up to the Office of Special Affairs International in approximately April of '84. My position was called litigation secretary. I was the head of what is now the Legal Bureau. At that time it was the Litigation Bureau.

Q. So you were litigation secretary up through June of '84 when Breckenridge's decision came out?

A. Yes.

Q. Then were you civil litigation officer?

A. No.

Q. What was next?

A. Next was deputy litigation chief for the United States; then was litigation chief. I'm not sure it was chief. No, it wasn't chief, it was director of both of those. Then I was the All Clear legal secretary. My next post in legal was litigation chief, legal aide.

Q. Legal aide is a different post?

A. It's different.

Q. I just want to make sure I'm clear.

A. Legal quality control officer and then civil litigation officer.

Q. And all of these positions were all positions within the ecclesiastical authority of CSI, right?

A. Not all that I listed.

Q. Let me go through them and check them off and then you can tell me.

A. You want me just to tell you where the ones within CSI start?

Q. Sure.

A. Litigation secretary, all the ones thereafter.

Q. Those were ecclesiastical positions?

A. No, all the ones from that one onward was within CSI. The ones previously were CSC, Church of Scientology California.

Q. So when you were supercargo USGO, that was within CSC?

A. That's right.

Q. Then you made reference to the reorganization and that's what has been called in the past "mission corporate category sort-out"?

A. No.

Q. That's a different reorganization?

A. Mission corporate sort-out didn't result in a reorganization; it was abandoned. It was a complete failure.

Q. The reorganization, then, to which you were making reference was the reorganization that resulted, at least in part, with the origination of CSI, RTC, Religious Technology Center, and CST, Church of Spiritual Technology, right?

A. In part. It began approximately in the summer of 1981 and was complete with a total disbandment of the Guardian's Office by October of '83.

Q. Now the list that you gave me of litigation secretary on, those all were within OSA, right?

A. That's correct.

Q. And OSA is an ecclesiastical organization, right?

A. The Office of Special Affairs International.

Q. Right.

A. What we've been calling OSA.

Q. Yes. Just so we're clear, there's a difference between the Office of Special Affairs and Office of

Special Affairs International, isn't there?

A. Yes.

Q. So when you and I have been talking here saying the words or the letters OSA, what my understanding has been is we've been referring to the international organization; is that the same as what yours has been?

A. I don't think I've used it any other way.

Q. I don't think you have either. I just want to make sure we're clear.

A. Yes.

Q. So with all that in mind, going back to Bates-stamped page 13 of Exhibit three, when you are talking about items two and three there and references made to ecclesiastical authority and governance in ecclesiastical matters by said hierarchy, what we're talking about is OSA International, right?

A. Not exclusively, no.

Q. But in part?

A. Small part certainly, but we're not the main line of ecclesiastical management of the religion; we're a small portion of that that deals with external matters such as this lawsuit. So we're not by any stretch of the imagination the mainline of activity of the Church.

Q. Right. I'm not meaning to suggest that you are.

A. Within those confines, fine.

what was done. Now, then, its subsequent importance to history will determine whether or not such things are kept, but within those guidelines.

MR. GREENE: I would like to mark as Defendant's six a one-page document that's an HCO policy letter that was reissued on 12 of April 1983.

(Whereupon Defendant's Exhibit 6 was marked for identification.)

MR. GREENE: Q. Directing your attention to Defendant's Exhibit six, do you recognize that document?

A. Let me read it first.

Q. Sure.

A. All right, I've read it

Q. Have you seen this document before?

A. Yes. Absent the Bates stamp.

Q. The title of this document is Verbal Tech: Penalties, right?

A. Yes.

Q. Has this policy letter, to your knowledge, ever been rescinded?

A. Not to my knowledge.

Q. As a Scientology executive is this policy letter something that you would do your best to comply with?

A. I would do my best to adhere to it, yes, especially since the second paragraph really exemplifies what we're talking about in term of standard technology. The materials of Scientology are contained in the materials and that's the best reference for them.

Q. Then the first paragraph where it says, "Any person found to be using verbal tech shall be subjected to a court of ethics." You know what a court of ethics is, right?

A. That's right.

Q. A court of ethics is a particular procedure within Scientology; is that right?

A. That's right.

Q. Part of Scientology has to do with a realm of practice that is known as ethics, right?

A. Realm of practice?

Q. Part of Scientology practice has to do with ethics, right?

A. Yes.

Q. And ethics has got a very specific meaning within Scientology, right?

A. Yes.

Q. As a general principle if an individual is having difficulty within Scientology it's because in Scientology parlance his or her ethics are out, right?

MS. BARTILSON: I'm going to object.

THE WITNESS: I wouldn't adopt that as a general principle, no. I would not adopt that as a general principle and you are right, we are getting --

MS. BARTILSON: We are really getting far afield here and I don't see any relevance to this. General practice of Scientology is exactly what he said it is.

MR. GREENE: We'll come back to it and it is quite relevant. I'll lay a better foundation.

MR. BENZ: I think the question has been answered.

THE WITNESS: It has been. I couldn't let the misstatement of it stand.

MR. BENZ: That's fine. So no ruling is required at this point, is what I'm saying.

MR. GREENE: Q. In fact, Exhibit number six has specifically been adopted by CSI, right?

A. That's what it says.

Q. To your knowledge, that's the truth, isn't it?

A. Yes, to my knowledge that's the truth.

MR. GREENE: I'd like to mark as Defendant's seven the HCO policy letter of 5 March '65.

(Whereupon Defendant's Exhibit 7
was marked for identification.)

MR. GREENE: Q. Directing your attention to seven and immediately to the obscured part --

A. Sorry, I didn't hear you.

Q. I want to direct your attention to the obscured part.

A. Okay.

Q. When you focus you can read the words, although they're not as easy to read as the rest of it. On page one there of Exhibit seven the part that's been obscured, as I see it it says, quote, "The sense in which we use policy is the rules and administrative formulas by which we agree on action and conduct our affairs," close quote.

A. Yes, that's what it looks like to me.

MS. BARTILSON: Do you have the original?

THE WITNESS: Mine is a generation earlier. Just for the record, the one handed Laurie was a couple of generations beyond that and couldn't be read.

MR. GREENE: Q. Do you have the original? Take a look at the original and satisfy yourself that Exhibit seven is --

MS. BARTILSON: See if it matches because there's junk all over it.

THE WITNESS: What am I supposed to match, this sentence?

MR. GREENE: Q. Just the document. You asked earlier if you could take a look at the green volume to be able to compare the exhibits.

A. Okay, fine. All right, it appears to match.

Q. All right. Exhibit seven, like all the other policy letters, as a Scientologist the expectation is to adhere to what is expressed in the policy letters, right?

A. Well, what is expressed in here in terms of the timeless nature would be adhered to, yes, like the general laws given up at the top. But, of course, one cannot continue to adhere to his description at the time he wrote it of the international board being composed of 336.

Q. Because that doesn't exist anymore.

A. Right.

Q. Of course not.

A. But the general laws and definitions of terms that are given here, yes.

Q. Which would include the definition here of a policy letter right underneath the obscured part?

A. I think -- oh, underneath, not in back of. "One which contains one or more policies and their explanation and application." Yes, correct.

Q. Now aside from any organizational inaccuracies that are set forth in Exhibit seven --

A. Organizational antiquities. They were accurate at the time.

Q. Aside from those things you would adhere to and comply with what's expressed in Exhibit seven, right?

A. Yes, aside from any organizational antiquities that have since been revised.

My watch shows quarter to.

Q. I have just one more, so let's do it. Defendant's Exhibit eight is an HCO Policy Letter of 9 August 72.

(Whereupon Defendant's Exhibit 8
was marked for identification.)

THE WITNESS: All right, I've read it.

MR. GREENE: Q. Has Exhibit eight been rescinded -- excuse me, strike that.

Do you recognize Exhibit eight?

A. Yes.

Q. Is that a current policy letter that's currently adhered to in Scientology according to your best knowledge?

A. Generally, yes, although the organizational entities referred to in the fifth paragraph have different names.

Q. That is the International Board Members?

A. I was thinking of the Authority and Verification Unit as the Authorization and Verification Unit.

Q. Now it's known as that?

A. Yes.

Q. What about the International Board members?

A. That would apply to CSI at present.

Q. What portion of CSI would that apply to?

A. The board members.

Q. So, then, in your practice as a Scientology executive you adhere to what's set forth in Exhibit eight, right?

A. Yes, I take the information from HCOBs and HCO PLs to be senior to other types of policy directors. It's a matter of interpretation of them.

Q. Okay, great. Let's break for lunch.

(Whereupon the deposition was adjourned for lunch.)

---o0o---

A. As you wish.

MR. GREENE: I want to mark as Defendant's nine an HCO policy letter of 25 November 1970 corrected and reissued 27 November 1970. Let the reporter mark it first.

(Whereupon Defendant's Exhibit 9 was marked for identification.)

MR. GREENE: Q. Would you take a few moments and read Exhibit number nine, which is a four-page document?

Actually, rather than have you read every word, can you tell whether or not you recognize it first?

MS. BARTILSON: I'm going to object and ask the witness be allowed to review the document before he can say if he recognizes it or not. It's a four-page document. It shouldn't take very long to look at it.

THE WITNESS: It appears to be a 1986 publication of this policy letter, again with the same caveat as before.

Do you want me to continue reading or is there a part you want me to focus on specifically?

MR. GREENE: Q. Let me focus on the third page at the top says, quote, "An order is the direction or command issued by an authorized person to a person or group within the sphere of the authorized person's authority," close quote.

A. Okay, I've read that.

Q. That principle applies currently within CSC, does it not, or CSI, excuse me?

A. Certainly the principle applies as a matter of the command channel's specific function of a senior post and junior post such to be totally accurate, but certainly the principle applies.

Q. Then the next sentence where it says, quote, "By implication an order goes from senior to juniors," close quote, that general principle is applicable currently in CSI, right?

A. Of course.

Q. Now you know an individual named Norman Starkey, don't you?

A. Yes.

Q. What is Norman Starkey's post?

A. He's the executive director of Author Services Incorporated, which is Mr. Hubbard's literary agency. He's the trustee of Mr. Hubbard's estate. Sorry, I did that wrong. Trustee of his trust and executor of his estate.

Q. To your knowledge, is David Miscavige senior to Mr. Starkey?

A. In what way?

MR. GREENE: Q. I would like to mark Exhibit 12, which is a packet of documents that's entitled Suppressive Acts, Suppression of Scientology and Scientologists, HCO Policy Letter of 23 December 1965, revised 8 January '91.

(Whereupon Defendant's Exhibit 12 was marked for identification.)

(Brief recess.)

MR. GREENE: Back on the record.

Q. Now, Mr. Farny, I want to direct your attention again back to Exhibit number ten, which is the Suppressive Person Declare for Gerry Armstrong. In 1982 you were posted within CSC, Church of Scientology of California?

A. That's correct.

Q. In 1982 CSC sued Gerald Armstrong, right?

A. Yes.

Q. And you were aware in 1982, were you not, that Gerald Armstrong had been declared a suppressive person?

A. Yes, I was.

Q. Exhibit number ten purports to be a Suppressive Person Declare with reference to Gerry Armstrong, right?

A. This is what it purports to be, but I can't authenticate it because I can't remember what is said at the time.

Q. Reviewing Exhibit ten is there anything about it which would lead you to conclude that document is not genuine?

A. It's words on a piece of paper. I have some knowledge that I don't presently have. I wouldn't be able to tell one way or the other.

Q. You are well familiar with Gerald Armstrong's matters regarding Scientology, are you not?

MS. BARTILSON: Objection, vague and ambiguous to the extent that it seeks knowledge that Mr. Farny may have gained as a legal employee of the Church dealing with attorneys. May also call for attorney-client privilege.

THE WITNESS: It's broad.

MS. BARTILSON: It's a little bit broad.

MR. BENZ: I'll overrule the objection and you might rephrase it. The term well-acquainted might be a little ambiguous. Acquainted would certainly be a proper question.

THE WITNESS: "Matters" is a little broad without some sort of definition.

MR. GREENE: Q. Starting with your employment in the legal department of CSC, you actively followed the events regarding the Armstrong litigation, didn't you?

A. Sure, that's a fair statement.

MR. WALTON: I'm sorry, Mr. Farny, I can't hear you.

Suppressive Group List, would you review that, please?

A. I obviously have not read every word. The attachment is in very small writing in multiple columns for several pages, but I glanced over it.

Q. Have you seen this document before?

A. I believe so.

Q. This document appears to you to be accurate, doesn't it?

A. Accurate compared to what? It appears to be what it says, but I don't know on this list attached whether -- I have to compare it to the one in the files to be totally accurate.

Q. Directing your attention to page number four where there's a section that says "declared suppressive persons"?

A. Declared suppressive persons, yes.

Q. See where Gerry Armstrong is listed there in the second column?

A. Yes.

Q. To the best of your knowledge, Gerald Armstrong in 1992 was considered to be a suppressive person by Scientology; isn't that right?

A. Again, the imprecise use of Scientology.

Q. Gerald Armstrong was considered by the Scientology religion to be a suppressive person, wasn't he?

A. I don't want to play word games. That's what his status is to this day with regard to the Scientology religion.

Q. That's right, and his status as an SP has been ever since 1982; isn't that right?

A. That seems right, yeah.

Q. How often are suppressive persons and suppressive group lists published?

A. I'm not certain. Periodically, and no, I don't know if one was published since 1992.

Q. Now directing your attention to Exhibit number 12 --

MS. BARTILSON: Can I get a copy?

THE WITNESS: I flipped through it.

MR. GREENE: Q. Directing your attention to the top of the first page, the actual HCO PL indicates that it was revised on January 8, 1991?

A. That's what it says.

Q. To your knowledge that's when the green volumes were revised, right or not?

A. I'm not certain exactly when in '91 they were revised.

Q. Now directing your attention to the bottom of the page where it says, "A suppressive person or a group is one that actively seeks to suppress or damage Scientology or a Scientologist by suppressive acts," do you see that?

A. Yes.

Q. Is that definition of a suppressive person that which you currently hold?

A. Yes.

Q. That definition of a suppressive person or group has not changed over the time that you have been involved in Scientology in general, has it?

A. It's essentially the same concept, yes.

Q. Now directing your attention to the next item where it says in capital letter "Suppressive Acts are acts calculated to impede or destroy Scientology or a Scientologist and which are listed at length in this policy letter," that definition of suppressive acts is that which you currently hold, isn't it?

A. Yes.

Q. That definition has also essentially remained the same throughout your affiliation with Scientology; isn't that right?

A. Yes.

Q. Now turning the page and under the section entitled Suppressive Acts, again it says, quote, "Suppressive acts are defined as actions or omissions of, I would say no because several of your questions have elicited in hearsay statements from me and those certainly would be suppressive acts. But testifying in a manner falsely and with the intention of destroying Scientology would, yes, be a suppressive act.

Q. Let me just direct your attention specifically to the item that's right underneath falsifying records.

A. Right. I got you what you are saying.

Q. Now with respect to that which says "Testifying or giving data against Scientology falsely or in generalities or without personal knowledge of the matters to which one testifies," that constitutes a suppressive act, doesn't it?

A. If the testimony fits within the more embracive definition of being an act undertaken knowingly to suppress, impede or destroy Scientology as it says at the beginning of this list, yes, it would be.

Q. Now going down the column to where it says "Issuing alter-ised Scientology technical data or information or instructional or admin procedures calling it Scientology or calling it something else to confuse or deceive people as to the true source, beliefs and practices of Scientology," with respect to that that constitutes a suppressive act, does it not?

A. Certainly, again within the overall embracive standing with Scientology organizations," that's a suppressive act, right?

A. Yes.

Q. Then the one following that where it says, "Public statements against Scientology or Scientologists but not to Committees of Evidence duly convened," that type of conduct, too, is considered to be suppressive activity to Scientology, right?

A. Would depend on the severity of the statements, but, yes, it is on the list; it would be considered suppressive.

Q. These items we're talking about here, these all are a matter of ecclesiastical concern to Scientology, right?

A. Yes.

Q. So all these matters that we've been talking about here under the category of Suppressive Acts really fall within the exclusive domain of the ecclesiastical concern of Scientology, right?

A. Some of them also overlap into the State because you have your garden variety felonies are also on the list, but the ones that don't, the ones that specifically pertain to ecclesiastical offenses are the exclusive purview of the ecclesiastical authority to adjudicate this.

CERTIFICATE OF DEPOSITION OFFICER

I, PENNY L. GILMORE, duly authorized to administer oaths pursuant to Section 8211 of the California Code of Civil Procedure, do hereby certify that LYNN ROBERT FARNY, the witness in the foregoing deposition, was by me duly sworn to testify the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein stated, that the testimony of said witness was reported by me, a Certified Shorthand Reporter and a disinterested person, and was thereafter transcribed into computer-assisted transcription under my direction.

I futher certify that I am not of counsel or attorney for either or any of the parties in the foregoing depositon and caption named, nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 7th day of August 1994.

____
DEPOSITION OFFICER, CSR NO. 4724

I hereby certify this copy is a true and exact copy of the Original.

Penny L Gilmore

DEPOSITION OFFICER, CSR NO. 4724

731

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

---oOo---

COPY

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION, a California for profit corporation; DOES 1 through 100, inclusive, Defendants.	NO. 157-680
AND RELATED CROSS-ACTION.	

DEPOSITION OF:

LYNN R. FARNY

Tuesday, July 26, 1994

VOLUME III

Reported by:
SUSAN M. LYON
CSR NO. 5829

PENNY L. GILMORE & ASSOCIATES
DEPOSITION REPORTERS
P.O. BOX 862
ROSS, CALIFORNIA 94957
(415) 457-7899

A. Same building.

Q. And where is that building?

A. Corner of Hollywood Boulevard in Los Angeles.

Q. And what's the address?

A. 6331 Hollywood Boulevard.

Q. I want to direct your attention now to Exhibit 15, which is a two-page document entitled Executive Directive, dated 20 September, 1984.

Now, at this point you were working, in 1984, you were working in the legal division of CSI, weren't you?

A. That's right.

Q. And do you recognize this document, Exhibit 15?

A. Yes.

Q. Okay.

MR. BOWLES: Do you have a copy of that, Mr. Greene?

MR. GREENE: I don't. I apologize.

Actually, I do. I've got a --

MR. BOWLES: Thanks.

MR. GREENE: -- shrunken copy.

Q. Would you tell me what Exhibit 15 is, please.

A. It's an executive directive of Office of Special Affairs International purporting to be issued on or about 20 September, 1984.

Q. Now, have you seen this document or a copy thereof before?

A. I've seen a copy of the Office of Special Affairs International executive directive 19 before, yes.

Q. And what is OSA Int executive directive 19?

MR. BOWLES: You want him to describe the document or --

MR. GREENE: No, just what his --

Q. You say you've seen it before and you're familiar with it. So if you would tell me what the meaning of the document is.

A. It was a document that was issued in the fall, late summer or early fall of 1984 to provide information for Scientologists concerning the ecclesiastical status of certain individuals discussed therein.

Q. And the ecclesiastical status with respect to the individuals set forth in Exhibit 15 is that their actions were destructive and aimed at the enslavement rather than the freedom of man; right?

MR. BOWLES: Are you just reading from the document, Mr. Greene or --

THE WITNESS: He is.

MR. BOWLES: That speaks for itself.

THE WITNESS: That's line two through four, three and four.

MR. GREENE: Q. You can answer the question.

A. It would appear so. That's what the document says.

Q. All right. Now, based on your knowledge of matters which transpired in the fall of 1984 within CSI, it's true, is it not, that it was generally known that Gerald Armstrong had been designated as a squirrel; right?

MR. BOWLES: Objection, vague. Generally known where?

MR. GREENE: Within CSI.

THE WITNESS: I don't know how generally known it was within CSI.

MR. GREENE: Q. It was known to you, wasn't it?

A. I'm not certain that Gerry did much active squirreling. He was obviously included in this issue because of his involvement with Lipkin and Ristuccia in the plot that was revealed in Griffith Park.

Q. Okay.

A. It was -- actually around September was in the process of being revealed, if I remember right. But it was around that time period that that went down as well.

So I'm not certain how much active squirreling he did, but he certainly earned inclusion in this with the rest of these individuals through that activity.

Q. All right. And there's nothing, to your knowledge, that's set forth in Exhibit 15 that's false, is there?

A. I'd have to read the whole thing.

the legal process. That's garbage and you know it.

This paid, hired gun people who would come in and say bad things just because they were being paid to do so were removed from the marketplace forcing you guys to deal with facts, and that appears to be something you can't tolerate, and that's why you got a problem with it, just so we're clear.

Q. I really appreciate your expounding, Mr. Farny.

A. Hey, no problem.

Q. Also, Howard Schomer, Homer Schomer was a witness in Wollersheim, wasn't he?

A. No, he was not allowed to testify. The court ruled he had nothing relevant to say to any issue and forbade him from opening his mouth in front of the jury.

Q. You testified in Wollersheim; right?

A. Yes.

Q. And Edward Walters testified in Wollersheim as well?

A. Same category as Sullivan, yes.

Q. And, in fact, he and Sullivan testified not on any mistreatment of Wollersheim but on the manner in which Scientology operated; right?

A. No. They made up their schtick and just, you know, flapped their gums just like they were being paid to do.

Q. Okay. And then you include, with respect to the characterization of them making up their schtick and flapping their gums, you would apply the same type of characterization to Gerald Armstrong, wouldn't you?

A. In what context?

Q. In the context of his participation in litigation and his phony declarations?

A. Well, I'll stipulate that the declarations are phony and that they contain lies.

Q. That's your view of them; right?

A. Certainly.

Q. And that Armstrong's -- he was lying about Scientology and its founder, as was Sullivan and Walters; right?

A. All three told things that were not true, that were lies, yes.

Q. And so did Schomer, didn't he?

A. He even admitted to having lied.

Q. Now, the stipulation whereby if Breckenridge's decision was reversed by Scientology's unopposed appeal thereof --

A. Time out, I can't adopt your characterization of it because the appeal at that stage had already been fully briefed, there was no further need for an appeal brief -- now just let me finish.

Q. Go ahead.

protect their overts against mankind and their only way out of this universe."

Q. That's correct. So let me ask you some questions about that paragraph, if I may, as it relates to Gerald Armstrong. Is that all right?

A. Except that I'm not sure as of September 1984 whether he had given such testimony. It does say some of them. If he had, fine. I'm pretty sure he had, so we can proceed and I'll do the best I can.

Q. All right. Hal Lipkin of the IRS; right?

A. That wouldn't be testimony. It would be information.

Q. Information?

A. Right.

Q. False testimony here is testimony, to your knowledge, used in the legal sense or in a more generic sense?

A. You got me.

Q. Based on --

A. My guess would be legal, because false testimony implies perjurious conduct rather than merely lies. And I think if it was merely lies, we would have said lies or false statements.

Q. Well, it's your view, is it not, that Armstrong testified falsely in the course of Armstrong One, isn't it?

A. Yes.

Q. And his declarations contained perjurious lies?

A. Yes. And I'm aware of those going to the IRS, so yes, this paragraph would apply to him.

Q. Now, would you explain to me what your understanding is of the meaning of the phrase "in order to protect their overts against mankind"?

A. Each of these individuals had been in a position of trust with regard to the religion of Scientology.

Gerry had been in a position of trust with regards to the personal archives of the founder of the religion.

Kima, Dee Dee, John Nelson, Laurel Sullivan and David Mayo all had positions of trust, some quite senior to the position Armstrong had.

What this phrase means is that each of these individuals committed harmful acts, an overt is a harmful act, against Scientology in violation of that trust, rather serious harmful acts to wind them up in the position that they were in as of the 20th of September, 1984.

Well, it makes those destructive acts a lot more palatable if one can get the IRS to come down on the church, and that's what's meant by that.

These people were providing false information to

A. No. What I said is sometimes the issues, executive directives specifically, would have annotated packages that go with them, with the documentary support.

Q. I see.

A. And sometimes they would not.

Q. All right.

A. I just don't know with respect to this one.

MR. GREENE: I'd like to mark this as Exhibit 19.

(Defendant's Exhibit No. 19 marked.)

MR. GREENE: Q. I'm showing you Exhibit 19, which is an eight-page document, which is entitled HCO policy letter of 21 November, 1972.

You can take a look at that, please.

A. Do you want me to read the entire thing or focus on something in particular?

Q. Initially, peruse it.

A. I've perused it.

Q. You're familiar with the term black propaganda, are you not?

A. Yes.

Q. And looking at the first paragraph of Exhibit 19, does that appear, to your knowledge, to be an accurate definition of black propaganda?

A. Yes.

Q. Now, in your view, was Gerald Armstrong engaged in a campaign of black propaganda against Scientology?

A. Any parameters as to time?

Q. Ever since December 1981.

A. Not the entire time period, but certainly large portions of that, yes.

Q. What portions of that time period do you exclude?

A. The time between when he walked out the door in December '81 and his first act and the time after December '86 up until his first act after that.

Q. And when was his first act after December 1986?

A. To the best of my knowledge, it was in '89 sometime, late '89.

Q. And what specifically was the act to which you were making reference?

A. Those we've discussed at length over the past three days.

Q. Which one?

A. The first, the first one in sequence.

Q. Which was the first in sequence, to your knowledge?

A. The Corydon one, I believe, was the first in sequence.

Q. And with respect to Corydon, what was it that Armstrong, what did he do?

A. What did he do?

Q. Did he testify? What did he do?

A. Once he got into deposition in the spring, I believe, he was spreading black propaganda, spreading lies.

Q. So the black propaganda that he gave and the lies that he spread were given under penalty of perjury in the course of the legal proceeding?

A. By no means all of them. He's done a lot of media in this country and abroad.

Q. And are you familiar with Exhibit 19?

A. I am familiar with the policy letter entitled "How to Handle Black Propaganda. I haven't read this one word for word to make a comparison.

Q. Would you take a look at it to whatever extent you need to tell me, at least generally, it comports with the policy letter with which you are familiar?

A. I'd say generally it does, but that's not an authentication.

Q. Okay.

A. Those are easier done in written discovery when you've got time to do just the word by word comparison.

Anyway, generally it does appear to be that policy letter, yes.

MR. GREENE: I want to mark another exhibit as 20.

(Defendant's Exhibit No. 20 marked.)

MR. GREENE: Q. Exhibit 20 is a four-page documen

I, SUSAN M. LYON, a Certified Shorthand Reporter in and for the State of California, do hereby certify:

That the witness named in the foregoing deposition was present and duly sworn to testify the truth in the within-entitled action on the day and date and at the time and place therein specified;

That the testimony of said witness was reported by me in shorthand and was thereafter transcribed under my direction into typewriting;

That the foregoing constitutes a full, true and correct transcript of said deposition and of the proceedings which took place;

That the witness was given an opportunity to read and, if necessary, correct said deposition and to subscribe the same;

That I am a disinterested person to the said action;

IN WITNESS WHEREOF, I have hereunto subscribed my hand this 8th day of August 1994.

Susan Lyon

SUSAN M. LYON

CSR #5829

Saint Hill Manor, East Grinstead, Sussex

HCO POLICY LETTER OF 1[illegible] FEBRUARY 1979
REISSUED 12 APRIL 1983

Remimeo
Tech/Qual
HCO

7327

(Reissued as part of the
Keeping Scientology Working Series)

(Also issued as HCOB 15 Feb. 1979, same title)

Armstrong
PFF/DEFT EXHIBIT 6
WIT: Torney
PENNY L. GILMORE, Reporter
7-12-94

Keeping Scientology Working Series 24

VERBAL TECH: PENALTIES

(*Ref:* HCOB/HCO PL 9 Feb. 79, HOW TO DEFEAT VERBAL TECH)

ANY PERSON FOUND TO BE USING VERBAL TECH SHALL BE SUBJECT TO A COURT OF ETHICS.

THE CHARGES ARE GIVING OUT DATA WHICH IS CONTRARY TO HCO BULLETINS OR POLICY LETTERS, OR OBSTRUCTING THEIR USE OR APPLICATION, CORRUPTING THEIR INTENT, ALTERING THEIR CONTENT IN ANY WAY, INTERPRETING THEM VERBALLY OR OTHERWISE FOR ANOTHER, OR PRETENDING TO QUOTE THEM WITHOUT SHOWING THE ACTUAL ISSUE.

ANY ONE OF THESE CATEGORIES CONSTITUTES VERBAL TECH AND IS ACTIONABLE PER THE ABOVE.

L. RON HUBBARD
Founder

Adopted as official
Church policy by
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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HUBBARD COMMUNI TIONS OFFICE
Saint Hill Manor, East tead, Sussex

7328

HCO POLICY LETTER OF 5 MARCH 1965
Issue II

Remimeo

Armstrong
PFL/DEF EXHIBIT 7
WIT: Armstrong
PENNY L. GILMORE, Reporter
7·12·94

POLICY: SOURCE OF

According to *Webster's New World Dictionary:*

POLICY: Political wisdom or cunning; diplomacy; prudence; artfulness. Wise, expedient or crafty conduct or management. *Any governing principle, plan or course of action.*

The last definition is the one we use.

According to the *World Book Encyclopedia Dictionary,* the one we most use (published by Field Enterprises Educational Corporation, Merchandise Mart Plaza, Chicago 54, Illinois, USA)

POLICY: A plan of action; way of management. Practical wisdom; prudence. Political skill or shrewdness. *Obsolete*—the conduct of public affairs; government.

[redacted]

A "policy letter" is one which contains one or more policies and their explanation and application.

It is issued by the Hubbard Communications Office, is written by L. Ron Hubbard or written (more rarely) for him, has the agreement of the International Board and is basic organizational law in organizations.

A "policy letter" is not Scientology org policy unless written or authorized by L. Ron Hubbard and passed as a resolution or covered by blanket resolution of the International Board and issued or published by an HCO. It is not policy if any of those steps are missing.

The International Board is composed of three board members: L. Ron Hubbard, Chairman; Mary Sue Hubbard, Secretary; and Marilynn Routsong, Treasurer. It is the controlling board of Scientology.

The Chairman, Hubbard Communications Office and HCO Secretaries and staffs compose Division 1 of the International Board and all orgs.

The Secretary and all Organization Secretaries (US and Saint Hill) or Association Secretaries (Commonwealth and South Africa) and their staffs compose Division 2 of the International Board and all orgs.

The Treasurer, Assistant Treasurers, all accounting executives, and assistants for Materiel and their staffs compose Division 3 of the International Board and all orgs.

Policy for all divisions and orgs is made as above.

There are no other boards or board members, individual board members, officers or secretaries with the power of issuing policy. Boards issue resolutions. Individual board members or officers can issue directives, general orders, and orders. These expire if not reissued as policy.

Other officers issue administrative directives in place of policy letters but these may only forward policy.

Secretarial Executive Director orders apply mainly to personnel or local conditions, expire in one year if not stated to expire earlier, may only last one year in any event.

Policy letters ap[illegible] broadly to all orgs and Scientologis[illegible] without exception.

Almost all policy [illegible] been developed by actual experience.

The only way policy can be changed is by writing up a policy letter in full and sending it to L. Ron Hubbard for approval or disapproval.

Policies cover hats, duties, lines, procedures, rules, laws and all other aspects of Scientology activity except technology.

Technology is covered in HCO Bulletins.

HCO Bulletins are written by or (more rarely) for L. Ron Hubbard and are issued by HCO and HCO Secretaries. They do not require sanction by the International Board.

No one else may issue or authorize an HCO Bulletin.

HCO Bulletins are recommended technical data. Certificates are awarded on the data contained in them and violation of it can therefore cause a suspension of the certificate. This is the main power of the HCO Bulletin.

An HCO Bulletin becomes policy only if mentioned in a policy letter.

A book may become policy if made so by a policy letter.

HCO Policy Letters are printed or (more commonly) mimeographed in green ink on white paper. This color combination may not be used for any other releases in Scientology. Reprinted policy letters sometimes appear in magazines in black ink on white paper but they are not the original.

HCO Bulletins are printed or mimeographed in red ink on white paper. This color combination may not be used for any other purpose in Scientology. Reprinted HCO Bulletins sometimes appear in magazines in black ink on white paper but they are not the original.

Committees of Evidence are called for in any violation of the publishing or counterfeiting of an HCO Policy Letter or an HCO Bulletin or their color combinations or signatures.

The only other official paper from L. Ron Hubbard and HCO is the HCO Executive Letter, usually a direct executive order or a request for a report or data or news or merely information. It is not policy but should be answered if an answer is requested. It is blue ink on green paper.

Using the color combination for any other purpose or counterfeiting one calls for a Committee of Evidence.

Sec EDs and HCO Executive Letters are basically LRH comm lines but are used by International Board Officers also if authorized.

The other divisions (2 and 3) have other means of comm, with other color flashes.

If it is not in an HCO Policy Letter it is not policy.

HCO Policy Letters do not expire until canceled or changed by later HCO Policy Letters.

No officer or Scientology personnel may set aside policy even when requesting revision.

L. RON HUBBARD
Founder

Adopted as official
Church policy by
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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HU D COMMUNICATIONS OFF
S. Hill Manor, East Grinstead, Sussex

HCO POLICY LETTER OF 9 AUGUST 1972

7330

Armstrong 8
PFL/DEFT EXHIBIT
WIT: Farny
PENNY L. GILMORE, Reporter
7·12·94

Remimeo
All Executive
Hats
All Bureaux
Hats

SENIORITY OF ORDERS

No Aides Order or Flag Bureaux Data Letter or Executive Directive, Directive or Base Order of any type or kind, written or verbal, may alter or cancel any Policy Letter or HCOB. These remain senior.

HCO Policy Letters are senior in admin. HCO Bulletins are senior to all other orders in tech.

Only Policy Letters may revise or cancel Policy Letters. Only HCOBs may revise or cancel HCOBs.

No Aides Order or other directive or order may abolish a network or org or change the form of an org.

HCO PLs and HCOBs require passing by LRH or the full authority of International Board Members as well as the Authority and Verification Unit.

Telexes which inform orgs or executives of modifications or cancellations of HCO PLs or HCOBs must quote the revision HCO PL or HCOB, and the revision must in fact exist and itself be issued and follow.

Any practice by which junior issues such as Directives abolish networks or make off-policy changes can only result in the destruction of networks, orgs and tech.

This is therefore a HIGH CRIME Policy Letter and it is an offense both to follow or obey or issue any verbal or written order or directive which is contrary to or changes or "abolishes" anything set up in HCO Policy Letters or HCOBs, including the downgrade of "that's out-of-date" or "that's been canceled" without showing the HCO PL or HCOB which revises or cancels.

HCO PLs and HCOBs are proven by time and are the senior data on which we operate.

L. RON HUBBARD
Founder

Adopted as official
Church policy by
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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HCO POLICY LETTER OF 25 NOVEMBER 1970
(CORRECTED AND REISSUED 27 NOV. 1[illegible])

Armstrong 9
PFL/DEFT EXHIBIT 9
WIT: Farny
PENNY L. GILMORE, Reporter
7-12-94

Org Series 16

POLICY AND ORDERS

Probably the greatest single confusion that can exist in the subject of organizing is the reversal of "policy" and "orders."

When definitions of these two things are not clearly understood, they can be identified as the same thing or even reversed.

When they are not understood plainly then staff members set their own policy and demand orders from top management, totally reversing the roles.

Confusion thus generated can be so great as to make an organization unmanageable. It becomes impossible for staff to do its job and management cannot wear its hat.

People in an organization obsessively demand orders from policy source and then act on their own policy. This exactly reverses matters and can be a continual cause of disorganization.

As policy is the basis of group agreement, unknown policy or policy set by the wrong source leads to disagreement and discord.

Demanding or looking for orders from policy source and accepting policy from unauthorized sources of course turns the whole organization upside down. The bottom of the org board becomes the top of the org bd. And the top is forced to act at lower levels (order issue) which pulls it down the org bd.

But this is not strange as we are dealing here with principles rather new in the field of organization, principles which have not been crisply stated. THERE IS NO EXACT ENGLISH WORD for either of these two functions.

POLICY as a word has many definitions in current dictionaries amongst which only one is partially correct: "A definite course or method of action to guide and determine future decisions." It is also "prudence or wisdom," "a course of action" and a lot of other things according to the dictionary. It even is said to be laid down at the top.

Therefore the word has so many other meanings that the language itself has become confused.

Yet, regardless of dictionary fog, the word means an exact thing in the specialized field of management and organization.

POLICY MEANS THE PRINCIPLE EVOLVED AND ISSUED BY TOP MANAGEMENT FOR A SPECIFIC ACTIVITY TO GUIDE PLANNING AND PROGRAMING AND AUTHORIZE THE ISSUANCE OF PROJECTS BY EXECUTIVES WHICH IN TURN PERMIT THE ISSUANCE AND ENFORCEMENT OF ORDERS THAT DIRECT THE ACTIVITY OF PERSONNEL IN ACHIEVING PRODUCTION AND VIABILITY.

POLICY is therefore a principle by which the conduct of affairs can be guided.

A policy exists, or should exist, for each broad field or activity in which an organization is involved.

Example: The co[illegible]any has a lunchroom for its employee[illegible]op policy concerning it might be "To prov[illegible]he employees cheaply with good foo[illegible]d clean fast service." From this the lunchroom manager could plan up and program how he was going to do this. With these approved they form the basis of the orders he issues.

Now let us say the manager of the lunchroom did not know organization and that he did not try to get a policy set or find if there was one and made up his own policy and planned and programed and issued his orders on that. Only the policy *he* makes up is "To make dough for the company."

Now the wild melee begins.

Top management (the lunchroom manager's highest boss) sees stenos eating cold lunches brought from home at their desks. And begins to investigate. How come? Stenos then say, "We find it cheaper to eat our own lunches." Top management finds coffee in the lunchroom is terrible and costs several shillings. Dried out sandwiches cost a fortune. There is no place to sit . . . etc. So top management issues *orders* (not policy). "Feed that staff!" But nothing happens because the lunchroom manager can't and still "make dough for the company." Top management issues more *orders*. The lunchroom manager thinks they must be crazy at board level. How can you make dough and still feed the whole staff? And top management thinks the lunchroom manager is crazy or a crook.

Now you multiply this several times over in an organization and you get bad feeling, tension and chaos.

Let us say top management had issued policy: "Establish and run a lunchroom to provide the employees cheaply with good food and clean fast service." But the lunchroom manager hired knew nothing of organization, heard it, didn't realize what policy was and classified it as a "good idea." Idealistic, probably issued for PR with employees. "But as an experienced lunchroom man I know what they really want. So we'll make a lot of dough for the company!"

He thereafter bases *all* his orders on this principle. He buys lousy food cheap, reduces quality, increases prices, cuts down cost by no hiring and does make money. But the company gets its income from happy customers who are handled by happy staff members. So the lunchroom manager effectively reduces the real company income by failing to cater to staff morale as was intended.

UNPREDICTABLE

It is a complete fact that no top management can predict WHAT policy will be set by its juniors.

The curse of this is that top management depends on "common sense" and grants greater knowledge of affairs to others at times than is justified. "Of course anybody would know that the paper knives we make are supposed to cut paper." But the plant manager operates on the policy that the plant is supposed to provide employment for the village. You can imagine the squabble when the paper knives which do NOT cut paper fail to sell and a threatened layoff occurs.

Nearly all labor-management hurricanes blow up over this fact of ignorance of policy. It is not actually a knowing conflict over different policies. It's a conflict occurring on the unknown basic of unknown or unset policy of top management and the setting of policy at an unauthorized level.

ORDERS

"Order" takes up two small print columns of the two-ton dictionaries.

The simple definition is

AN ORDER IS THE DIRECTION OR COMMAND ISSUED BY AN AUTHORIZED PERSON TO A PERSON OR GROUP WITHIN THE SPHERE OF THE AUTHORIZED PERSON'S AUTHORITY.

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By implication an ORDER goes from a senior to juniors.

Those persons who do not conceive of an organization larger than a few people tend to lump all seniors into order-issuers, tend to lump anything such a senior says into the category of order and tend to lump all juniors into order-receivers.

This is a simple way of life, one must say.

Actually it makes all seniors bosses or sergeants and all juniors into workers or privates. It is a very simple arrangement. It does not in any way stretch the imagination or sprain any mental muscles.

Unfortunately such an organized arrangement holds good for the metal section of the shop or a platoon or squad. It fails to take into account more sophisticated or more complex organizations. And it unfortunately requires a more complex organization to get anything done.

Where one has squad mentality in a plant or firm, one easily gets all manner of conflict.

Few shop foremen or sergeants or chief clerks ever waste any time in trying to tell the "rank and file" what the policy is. "Ours was not to reason why" was the death song of the Light Brigade. And also the open door to communism.

Communism is unlikely to produce a good society because it is based on squad mentality. Capitalism has declined not because it was fought but because it could not cope with squad mentality. The policies of both are insufficiently embracive of the needs of the planet to achieve total acceptability.

An order can be issued solely and only because its issuer has in some fashion attained the right to issue the instruction and to expect compliance.

The officer, the chief clerk, the shop steward, the sergeant, each one has a license, a warrant, a "fiat" from a higher authority which entitles him to issue an *order* to those who are answerable to him.

So where does this authority to issue orders come from?

The head of state, the government, the board of directors, the town council, such bodies as one could consider top management in a state or firm, issues the authority to issue orders.

Yet such top persons usually do not issue authority to issue orders without designating what the sphere of orders will be and what they will be about.

This is the policy-making, appointment-making level at work.

All this is so poorly and grossly defined in the language itself that very odd meanings are conceived of "policy" and "orders."

Unless precise meanings are given, then organization becomes a very confused activity.

Understood in this way, the following sentence becomes very silly: "The board of directors issued orders to load the van and the driver was glad to see his policy of interstate commerce followed."

Yet a group will do this to its board of directors constantly. "You did not issue orders. . . ." "We were waiting for orders. . . ." "I know we should have opened the doors but we had no orde[illegible] the council. . . ."

The same group members, waiting for orders to sit or stand by special board resolution, will yet set policy continually. "We are trying to let others do their jobs without interference." "I am now operating to make each member of my department happy." "I am running this division to prevent quarrels."

Ask officers, secretaries, in-charges, "What policy are you operating on?" and you will get a quick answer that usually is in total conflict or divergence from any board policy. And you will get a complaint often that nobody issues their division orders so they don't know what to do!

The fact is that POLICY gives the right to issue orders upon it to get it in, followed and the job done.

A group of officers each one issuing policy madly while waiting for the head of the firm to give them orders is a scene of mix-up and catastrophe in the making.

Policy is a long, long-range guiding principle.

An order is a short-term direction given to implement a policy or the plans or programs which develop from policy.

"People should be seated in comfortable chairs in the waiting room" is a policy.

"Sit down" is an order.

If policy is understood to authorize people to issue orders, the picture becomes much clearer.

"Clearing post purpose" is another way of saying "Get the policy that establishes this post and its duties known and understood."

Unless an organization gets this quite straight, it will work in tension and in internal conflict.

When an organization gets these two things completely clear, it will be a pleasant and effective group.

L. RON HUBBARD
Founder

Adopted as official
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The Organization Executive Course

Armstrong
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by L. Ron Hubbard

HCO DIVISION

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HCO POLICY LETTER OF 23 DECEMBER 1965RB
REVISED 8 JANUARY 1991

Gen. Non-Remimeo
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Int'l Justice Chief
Snr HCO Network
All HCOs
MAAs
Ethics Officers

(HCO Division 1)

Ethics

SUPPRESSIVE ACTS
SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS

Refs:

HCOB	10 Sept. 83	PTSness AND DISCONNECTION
Tape:	6505C18	"Organization and Ethics"
Tape:	6506C08	"Handling the PTS"
Tape:	6608C02	"Suppressives and GAEs"
Tape:	6608C25	"The Antisocial Personality"
HCOB	27 Sept. 66	THE ANTISOCIAL PERSONALITY THE ANTI-SCIENTOLOGIST
HCOB	24 Apr. 72 I	C/S Series 79 ExDn Series 5 PTS INTERVIEWS
HCOB	10 Aug. 73	PTS HANDLING
HCOB Rev. 26.7.86	31 Dec. 78RA II	OUTLINE OF PTS HANDLING
HCOB Rev. 21.3.89	31 Dec. 78RA III	EDUCATING THE POTENTIAL TROUBLE SOURCE, THE FIRST STEP TOWARD HANDLING PTS C/S-1
HCO PL Rev. 10.9.83	20 Oct. 81R	PTS TYPE A HANDLING
HCOB	8 Mar. 83	HANDLING PTS SITUATIONS
HCOB Rev. 20.12.83	17 Apr. 72R	C/S Series 76R C/Sing A PTS RUNDOWN

Due to the extreme urgency of our mission, I have worked to remove some of the fundamental barriers from our progress.

The chief stumbling block, huge above all others, is the upset we have with POTENTIAL TROUBLE SOURCES and their relationship to suppressive persons or groups.

A POTENTIAL TROUBLE SOURCE is defined as a person who while active in Scientology or a pc yet remains connected to a person or group that is a suppressive person or group.

A SUPPRESSIVE PERSON or GROUP is one that actively seeks to suppress or damage Scientology or a Scientologist by suppressive acts.

SUPPRESSIVE ACTS are acts calculated to impede or destroy Scientology or a Scientologist and which are listed at length in this policy letter.

ientologist caught in the situation of being in Scientology while still connected with a suppressive person or group is given a present time problem of sufficient magnitude to prevent case gain, as only a PTP can halt progress of a case. Only ARC breaks worsen it. To the PTP is added ARC breaks with the suppressive person or group. The result is no-gain or deterioration of a case by reason of the suppressive connection in the environment. Any Scientologist, in his own experience, can probably recall some such cases and their subsequent upset.

Until the environment is handled, nothing beneficial can happen. Quite the contrary. In the most flagrant of such cases, the Scientologist's case worsened and the suppressive person or group sent endless distorted or false reports to press, police, authorities and the public in general.

Unless the potential trouble source, the preclear caught up in this, can be made to take action of an environmental nature to end the situation, one has a pc or Scientologist who may cave in or squirrel because of no case gain and also a hostile environment for Scientology.

This policy letter gives the means and provides the policy for getting the above situation handled.

A potential trouble source may receive no processing until the situation is handled.

Suppressive persons or groups relinquish their rights as Scientologists by their very actions and may not receive the benefits of the Codes of the Church.

The families and adherents of suppressive persons or groups may not receive processing. It does not matter whether they are or are not Scientologists. If the families or adherents of suppressive persons or groups are knowingly processed, any auditor doing so is guilty of a misdemeanor. (See HCO PL of 7 Mar. 65RA III, OFFENSES AND PENALTIES.)

A potential trouble source knowingly permitting himself or herself or the suppressive person to be processed without advising the auditor or Scientology authorities is guilty of a crime. (See HCO PL of 7 Mar. 65RA III, OFFENSES AND PENALTIES.)

SUPPRESSIVE ACTS

Suppressive acts are defined as actions or omissions undertaken to knowingly suppress, reduce or impede Scientology or Scientologists.

Such suppressive acts include:

Any felony (such as murder, arson, etc.) against person or property.

Sexual or sexually perverted conduct contrary to the well-being or good state of mind of a Scientologist in good standing or under the charge of Scientology, such as a student or a preclear.

Blackmail of Scientologists or Scientology organizations threatened or accomplished—in which case the crime being used for blackmail purposes becomes fully outside the reach of Ethics and is absolved by the fact of blackmail unless repeated.

Using the trademarks ar[illegible]ce marks of Dianetics ar[illegible]tology without express permission o[illegible] license from the owner of the marks or its authorized licensee.

Falsifying records.

Testifying or giving data against Scientology falsely or in generalities or without personal knowledge of the matters to which one testifies.

Organizing splinter groups to diverge from Scientology practices still calling it Scientology or calling it something else.

Organizing a splinter group to use Scientology data or any part of it to distract people from standard Scientology.

Using Scientology (or perverted and alter-ised tech and calling it Scientology) harmfully so as to bring about disrepute to an org, group or Scientology itself.

Issuing alter-ised Scientology technical data or information or instructional or admin procedures, calling it Scientology or calling it something else to confuse or deceive people as to the true source, beliefs and practices of Scientology.

Unauthorized use of the materials of Dianetics and Scientology.

Holding, using, copying, printing or publishing confidential materials of Dianetics and Scientology without express permission or license from the author of the materials or his authorized licensee.

Falsely attributing or falsely representing oneself or others as source of Scientology or Dianetics technology; or using any position gained with staff and/or public to falsely attribute nonsource material to source or to falsely represent nonsource material as authorized Scientology or Dianetics technology.

Acts calculated to misuse, invalidate or alter-is legally or in any other way the trademarks and service marks of Dianetics and Scientology.

Intentional and unauthorized alteration of LRH technology, policy, issues or checksheets.

Developing and/or using squirrel processes and checksheets.

Knowingly giving testimony which is false, a generality or not based on personal knowledge to imperil a Scientologist.

Public disavowal of Scientology or Scientologists in good standing with Scientology organizations.

Public statements against Scientology or Scientologists but not to Committees of Evidence duly convened.

Proposing, advising or voting for legislation or ordinances, rules or laws directed toward the suppression of Scientology.

Pronouncing Scientologists guilty of the practice of standard Scientology.

Testifying hosti[illegible] [illegible]ore state or public inquirie[illegible] Scientology to suppress it.

Reporting or threatening to report Scientology or Scientologists to civil authorities in an effort to suppress Scientology or Scientologists from practicing or receiving standard Scientology.

Bringing civil suit against any Scientology organization or Scientologist, including the nonpayment of bills or failure to refund, without first calling the matter to the attention of the International Justice Chief and receiving a reply.

Demanding the return of any or all fees paid for standard training or processing actually received or received in part and still available but undelivered only because of departure of the person demanding (the fees must be refunded but this policy applies).

Writing anti-Scientology letters to the press or giving anti-Scientology or anti-Scientologist data to the press.

Continued membership in a divergent group.

Continued adherence to a person or group pronounced a suppressive person or group by HCO.

Failure to handle or disavow and disconnect from a person demonstrably guilty of suppressive acts.

Being at the hire of anti-Scientology groups or persons.

Calling meetings of staffs or field auditors or the public to deliver Scientology into the hands of unauthorized persons or persons who will suppress it or alter it or who have no reputation for following standard lines and procedures.

Infiltrating a Scientology group or organization or staff to stir up discontent or protest at the instigation of hostile forces.

Mutiny.

Seeking to splinter off an area of Scientology and deny it properly constituted authority for personal profit, personal power or "to save the organization from the higher officers of Scientology."

Engaging in malicious rumormongering to destroy the authority or repute of higher officers or the leading names of Scientology or to "safeguard" a position.

Delivering up the person of a Scientologist without justifiable defense or lawful protest to the demands of civil or criminal law.

Receiving money, favors or encouragement to suppress Scientology or Scientologists.

Using an org position or comm line to build up a private practice which reroutes org students, pcs and/or staff off org lines.

Severe breach of ecclesiastical and/or fiduciary duty as an executive or corporate official of any Scientology or Dianetics organization which has resulted in severe harm, loss or disrepute for Scientology or the organization.

Using Scientology lines [illegible]sonal profit in such a way [illegible]use disruption in the organization or to block the flow of public up the Bridge.

Using the mailing lists of Scientology or Dianetics organizations for personal profit or gain.

Employing org staff members to the detriment of the production or the establishment of the organization.

Providing an organization's preclear folders, ethics files, student files, accounts files, Central Files folders or Central Files lists or partial lists or Addresso lists or partial lists to any individual, group, organization, mission or other unit or agency for any reason or purpose, except those covered explicitly in existing Church policy; or to provide such files or lists to any individual, group, organization, mission or other unit or agency which is unauthorized by or in bad standing with the Mother Church.

Calculated efforts to disrupt Church services or the flow of public up the Bridge through the Churches.

Refusal to allow staff or public to progress up the Bridge or creating blocks on the Bridge preventing such progression.

Blatant and willful obstruction of Church operations or interference with Church contractual and other obligations to the detriment of Church expansion or activities.

Violation or neglect of any of the ten points of Keeping Scientology Working, as listed here:

One: Having the correct technology.

Two: Knowing the technology.

Three: Knowing it is correct.

Four: Teaching correctly the correct technology.

Five: Applying the technology.

Six: Seeing that the technology is correctly applied.

Seven: Hammering out of existence incorrect technology.

Eight: Knocking out incorrect applications.

Nine: Closing the door on any possibility of incorrect technology.

Ten: Closing the door on incorrect application.

Violations of any of the ten points listed below that are Technical Degrades:

1. Abbreviating an official course in Dianetics and Scientology so as to lose the full theory processes and effectiveness of the subjects.
2. Adding comments to checksheets or instructions labeling any material "background" or "not used now" or "old" or any similar action which

will result in the student not knowing, using and applying the data in which he is being trained.

3. Employing after 1 Sept. 1970 any checksheet for any course not authorized by myself or the Authority, Verification and Correction Unit International (AVC Int).

   (Hat checksheets may be authorized locally.)

4. Failing to strike from any checksheet remaining in use meanwhile any such comments as "historical," "background," "not used," "old," etc., or *verbally stating it to students.*

5. Permitting a pc to attest to more than one grade at a time on the pc's own determinism without hint or evaluation.

6. Running only one process for a lower grade between 0 to IV, where the grade end phenomena has not been attained.

7. Failing to use all processes for a level where the end phenomena has not been attained.

8. Boasting as to speed of delivery in a session, such as "I put in Grade 0 in three minutes." Etc.

9. Shortening time of application of auditing for financial or labor-saving considerations.

10. Acting in any way calculated to lose the technology of Dianetics and Scientology to use or impede its use or shorten its materials or its application.

Musical chairs (transfers of persons around an org) is *the single most destructive action to an org's stats.*

A stupid or suppressive person will tear up Division A to get personnel for Division B. These errors are of long duration, and they do more to destroy an org than any other action: (A) Making a hole in one place to remedy a hole in another, (B) Training a person for tech but not admin and putting him in admin, (C) Using the Technical Divisions as personnel pools from which to man other divisions, (D) Rapid shifts of post, (E) Leaving areas in an org unmanned. These personnel errors (or crimes) cause every staff member to suffer in terms of lowered income, lowered pay, lowered facilities, lowered success.

Noise, session interruption. Loud sudden noises, loud bursts of laughter, shouting, whistling, noisy conversation in the area of sessions. As such noises are interruptive of processing, persons making such are to be reported to Ethics. The following penalties will automatically accrue without recourse: One report will be a suspension of training for one week. Two reports will be declaration of the offender as a suppressive person.

Comm cycle additives. There are *no* additives permitted on the auditing comm cycle. It is a serious matter to get a preclear to clarify his answer. It is in fact an Ethics matter and if done habitually is a suppressive act, for it will wipe out all gain.

Withhold of vital information. Obstruction of vital technical or management information lines in such a way as to deny people tech data, prevent students and pcs moving up the Bridge, or obstructing the relay, disclosure or free distribution of vital information so as to prevent its arriving amongst the public and orgs in terms of results.

Informing fellow staff members and others that one is leaving staff. Where a person is secretly planning to leave and making private preparations to do so without informing the proper terminals in an org and does leave (blow) and does not return within a reasonable length of time, an automatic declare is to be issued. Should any monies or organizational property be found to be missing in consequence, action is to be taken on criminal charges.

The following policy violation is the highest crime in Tech or Qual:

> Tolerating the absence of or not insisting upon star-rated checkouts on all processes and their immediate technology and on relevant policy letters on HGC interns or staff auditors in the Tech Division or staff auditors or interns in the Qual Division for the levels and actions they will use before permitting them to audit org pcs, and on Supervisors in Tech and Qual who instruct or examine or failing to insist upon this policy or preventing this policy from going into effect or minimizing the checkouts or lists.

Spreading false tales to invalidate Clears or spreading libelous and slanderous statements about the alleged behavior of Clears.

It is a high crime to cut the basic communication lines of Scientology. This includes instances where impedance or negligence denies adequate supply of technical materials to HGC or Qual auditors and to Dianetics or Scientology students.

Knowingly falsifying an auditing report in order to make oneself seem more competent than one is or to hide departures from the Case Supervisor or to omit vital data necessary to case supervising resulting in upsets to a case and time spent in investigation by seniors is actionable by Committee of Evidence, and if the matter is proven beyond reasonable doubt, a cancellation of all certificates and awards, a declare and expulsion order are mandatory.

Permitting in a course room any of the six out-ethics activities listed below is a Committee of Evidence offense, and Supervisors, Directors of Training Technical Secretaries, Qualifications Secretaries or Ethics Officers so found guilty are subject to declare as a suppressive person.

1. Not mustering students in the morning, after lunch and after dinner, precisely on time, not noting absences and taking action.
2. Permitting students to talk to each other or wander around or take unscheduled breaks or goof off during course hours.
3. Permitting students to eat or smoke in the course room.
4. Permitting persons to come into the course room and bother students for any reason.
5. A Course Supervisor standing around or sitting at his desk not actively handling students who need help.

6. Not getting [illegible]dents through their course and [illegible]raduated.

Any Case Supervisor case supervising for a level for which he has not been trained is subject to the suspension of all certificates and deprivation of all bonuses as well as refund of all bonuses ever obtained while case supervising, as a Case Supervisor, levels for which he has not been trained above or below his class. This does not limit the penalties which can be applied which can include declare and expulsion.

Any staff member who either verbally or by his actions threatens to crash or deliberately crashes his stats in order to avoid a legal or on-policy order or ethics action is to be instantly declared.

It is a high crime for any staff member to knowingly or unknowingly waste org book stocks or cause them to be wasted or tampered with.

It is further a high crime for a staff member, Bookstore Officer or executive to fail to take the necessary precautions for the protection and correct use of org book stocks.

It is a high crime to publicly depart Scientology.

Any repeated or continued violation of the five points of out study tech listed below, after two Courts of Ethics for violation of these points, subjects the person to a Committee of Evidence on the charge of committing an act or omission undertaken to knowingly suppress, reduce or impede Scientology or Scientologists, and if found guilty beyond reasonable doubt, the person may be declared suppressive and expelled with full penalties:

1. A person may be summoned to a Court of Ethics or Executive Court of Ethics if it be found that he has gone past a word he does not understand when receiving, hearing or reading an order, HCOB, policy letter or tape, any and all LRH written or printed materials including books, PABs, despatches, telexes and mimeo issues which resulted in a failure to do duties of his post, without his at once making an effective effort to clear the words on himself, whether he knew he was missing them or not, as the source of his inaction or damaging actions.

   The charge is *neglecting to clarify words not understood.*

2. A staff member who does not use study tech or get it known while studying or instructing may be summoned to a Court of Ethics or an Executive Court of Ethics.

   The charge is *failure to employ study tech.*

3. A student alter-ising or misadvising others on the use of study tech may be summoned before a Court of Ethics.

   The charge is *advocating a misuse or neglect of proper study tech.*

4. An auditor failing to clear each and every word of every command or list used may be summoned before a Court of Ethics.

   The charge is *out-tech.*

Any Public Division person, staff member or Scientologist found using terms, circumstances or data on raw public in public lectures or promotion or in PR beyond the public ability to grasp without stressing study tech or at once taking effective measures to clarify, or releasing materials broadly to a wrong public may be summoned to a Court of Ethics if any flap or upset results.

The charge is *failure to apply study tech in dissemination.*

To alter and pervert tech or procedure to prevent discovery of withholds is classified as a suppressive act. This enters many areas: changing or losing issues, issuing issues in Board Technical Bulletin (BTB) or Board Policy Letter (BPL) form that contain incorrect and misleading data, posting known criminals or incompetents to training posts, verbal tech or any action which would prevent tech from being known or correctly used.

Where proven beyond reasonable doubt that funds and business have been diverted from an org to its detriment, a declare order on those responsible is mandatory, and possible criminal prosecution may be undertaken.

Admitting a famous person or notable writer to higher-level processing who has not fully attained lower-level processing. This applies in particular to Power, Clearing Courses and OT Courses.

Failure to strenuously act to clean up an "ARC broken field" shall be deemed a high crime for an Executive Council.

It is a high crime to permit suppressive and PTS people in Publications Orgs or departments or in Department 16C (Division 6A, advertising) as these will starve both the public and the org.

Any executive issuing an order that certain HCO PLs or HCOBs are not to be followed, where this is proven beyond reasonable doubt, shall be considered as having committed a high crime, and this can carry the assignment of the condition of Treason for both the person issuing the order and the person who receives and executes it.

Any auditor seeing a rock slam on a preclear and failing to mark it down and report it is guilty of a high crime, as this injures society, the org and the person himself.

When a preclear has roller-coastered despite a floating needle at session end and at Examiner's and if neither Tech nor Qual makes any effort to remedy, then the matter becomes a high crime.

If red tags, per the Examiner's 24-hour rule, continue unhandled by Tech or Qual, the matter becomes a high crime.

It is a high crime for a Case Supervisor not to WRITE in a preclear's folder what the case supervised instructions are and a high crime for an auditor to accept verbal C/S instructions.

Word clearing any words on any test at any time is a high crime. It suppresses tech results and obscures them.

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It is a high crime for [illegible]erson to supervise a course w[illegible] [illegible]does not know, apply and continually use his study tech on every individual student.

It is also a high crime for a Director of Training or a Tech Sec or an Esto to have anyone supervising without FULL USE OF STUDY TECH.

It is a Committee of Evidence offense for a Case Supervisor or auditor to C/S or accept for processing and process any illegal pc. (Ref: HCOB 6 Dec. 76RB, ILLEGAL PCs, ACCEPTANCE OF, HIGH CRIME BULLETIN)

Feeding the Clear cognition to any individual, evaluating for a pc on this subject or coaxing him to any cognition is criminal and a comm-evable offense. Clears are made through auditing, not by feeding cognitions to pcs.

Declaring a Dianetic Clear "achieved in other practices."

Falsely declaring someone Dianetic Clear who isn't and failing to declare one who made it on Dianetics or the Clearing Course or who has *always* been Clear.

It is a high crime for an executive to penalize auditors, C/Ses, Tech/Qual or Ethics Officers for following HCOBs or HCO PLs, especially when it is due to the executive's withholds. (It is also a high crime to falsely charge an executive with the above.)

Attempting to undermine or advising or encouraging or condoning the abandonment or reduction of use of the full technology of locating and handling overts, evil purposes, destructive intentions and nonsurvival considerations.

Neglecting, advising against the application of, failing to enforce or tolerating the omission of standard Word Clearing and star-rate checkouts on all new or newly revised HCO Policy Letters, as well as the key HCO PLs of the Basic Staff Member Hat and the key policies of the staff member's specific assigned post, by every staff member. In the Sea Organization this applies to LRH CBOs and Flag Orders as well as HCO Policy Letters.

Violation of any of the eleven points listed below which are Admin Degrades:

1. Abbreviating an official course in standard Scientology administrative policy so as to lose the full theory, administrative procedures and effectiveness of the subject.
2. Adding comments to the Org Exec Course or other administrative checksheets or instructions, policies or directives labeling any material "background" or "not used now" or "old" or "it doesn't need to be followed exactly," or any similar action which will result in the student not knowing, using and applying the standard administrative data in which he is being trained.
3. Employing any checksheet for any administrative course not authorized by the Authority, Verification and Correction Unit International (AVC Int) or, in the case of hat checksheets, duly authorized per HCO PL 30 Sept. 70, CHECKSHEET FORMAT.
4. Failing to strike from any administrative or hat checksheet any such

comments as "[illegible]torical," "background," "not [illegible]d," "old," etc., or VERBALLY STATING IT TO STUDENTS.

5. Failing to hat and apprentice a staff member on the full policy and actions of his post.
6. Discouraging or preventing a staff member, administrator or executive from training on the full Org Exec Course and Flag Executive Briefing Course.
7. Failing to insist upon precise and exact application of the Data Series policy letters in investigations and evaluations.
8. Running any organization on squirrel "policy" or third dynamic administrative or management procedures that are contrary to approved policy.
9. Using any squirrel administrative procedure in managing an organization while falsely labeling it Scientology policy.
10. Using Scientology policy but calling it something else or attributing it to some other source.
11. Acting in any way calculated to lose standard Scientology policy to use or impede its use or shorten its materials or its application.

It is a high crime for anyone who has not fully and successfully completed the Hubbard Key to Life Course to supervise or otherwise administer this course to another or others.

Feeding a person the end phenomena of the Hubbard Key to Life Section 2B Clay Table Process is classified as a suppressive act, because it will probably harm his progress and hurt his chances. Penalties for doing so could include expulsion.

Forcing auditing on a pc when he is refusing or protesting it, rather than finding out why the pc doesn't want the auditing and straightening it out is using auditing suppressively. Any C/S or auditor guilty of this must be handled with group justice proceedings which would include a Comm Ev and could include a penalty of being declared suppressive and expelled from the Church.

Additionally, a crime, if severe and of magnitude, harmful to many and committed repeatedly, can be reclassed as a high crime. (See HCO PL 7 Mar. 65RA III. OFFENSES AND PENALTIES, for those actions which classify as crimes.)

Suppressive acts are clearly those covert or overt acts knowingly calculated to reduce or destroy the influence or activities of Scientology or prevent case gains or continued Scientology success and activity on the part of a Scientologist. As persons or groups that would do such a thing act out of self-interest only to the detriment of all others, they cannot be granted the rights ordinarily accorded rational beings.

If a person or a group that has committed a suppressive act comes to his, her or their senses and recants, his, her or their only terminal is the International Justice Chief, via the Continental Justice Chief, who:

A. Tells the pers[illegible]or group to stop committing pr[illegible]nt time overts and to cease all attacks and suppressions so he, she or they can get a case gain;

B. Requires a public announcement to the effect that they realize their actions were ignorant and unfounded and stating where possible the influences or motivations which caused them to attempt to suppress or attack Scientology; gets it signed before witnesses and published broadly, particularly to persons directly influenced or formerly associated with the former offender or offenders. The letter should be calculated to expose any conspiracy to suppress Scientology or the preclear or Scientologist if such existed;

B1. Requires that all debts owed to Scientology organizations or missions are paid off;

B2. May require that, subject to the approval of the International Justice Chief, an amends project suitable and commensurate with the severity and extent of the suppressive acts committed be completed before further A to E steps are undertaken;

Before any such amends project is begun, the person must submit an Amends Project Petition to the International Justice Chief, using full CSW and stating what he proposes to do as amends, and this must be approved by the International Justice Chief to be considered valid. (Ref: HCO PL 1 May 65, STAFF MEMBER REPORTS, and HCO PL 1 May 65 II, ORDER BOARD AND TIME MACHINE) Evidence of genuine ethics change may be required before approval of the amends project is given. (Examples of such evidence might be, depending upon the high crimes committed: the person has obtained an honest job; has paid off all debts owed to others; valid contributions have been made to the community; the person has totally ceased those actions for which he was declared, etc.);

It is also within the power of the International Justice Chief, when approving an Amends Project Petition, to require, as a protector of the Church and its tenets and membership, that such amends project be carried out entirely off any Scientology organization, mission or network lines, and to require, before the amends project may be considered complete, extensive evidence over a protracted period of time that the person has, beyond any doubt, ceased his or her suppressive actions, has created no problems for the Church or any member of the Church in any way on any line, and has undertaken and completed an action which is clearly and undeniably of benefit to mankind;

C. Requires training beginning at the lowest level of the Bridge at their expense if executives in charge of training will have the person or the group members;

D. Makes a note of all of the above matters with copies of the statement and files in the ethics files of those concerned;

E. Informs the International Justice Chief and forwards a duplicate of the original statements which show signatures.

Any potential trouble source owing money to any Scientology organization is handled the same as any other Scientologist. Failure to discharge a financial obligation becomes a civil matter after normal, within-org avenues of collection have been exhausted.

Any PTS who fails to either handle or disconnect from the SP who is making him or her a PTS is, by failing to do so, guilty of a suppressive act.

Civil court action against SPs to effect collection of monies owed may be resorted to, as they are not entitled to Scientology ethics procedures.

Until a suppressive person or group is absolved or until permitted to actively engage in the training required in point C, as duly authorized and published, his, her or their only Scientology terminal is the International Justice Chief via the Continental Justice Chief, or members of a duly authorized and convened Committee of Evidence.

A suppressive declare order upon a person or group and all of the conditions inherent within it remain in force until the order has been officially cancelled by an authorized and published Church issue.

Also, until a suppressive person or group is absolved, but not during the period when the person requests and has a Committee of Evidence, or an amnesty occurs, no Scientology ethics other than this HCO Policy Letter applies to such persons, no Committee of Evidence may be called on any Scientologist or person for any offenses of any kind against the suppressive person except for offenses which violate the laws of the land or except to establish in cases of real dispute whether or not the person was suppressing either Scientology or the Scientologist.

Such persons are in the same category as those whose certificates have been cancelled, and persons whose certificates, classifications and awards have been cancelled are also in this category.

The imagination must not be stretched to place this label on a person. Errors, misdemeanors and crimes do not label a person as a suppressive person or group. Only high crimes do so.

A Committee of Evidence may be called by any convening authority who wishes more concrete evidence of efforts to suppress Scientology or Scientologists, but if such a committee's findings, passed on, establish beyond reasonable doubt suppressive acts, this policy letter applies.

Outright or covert acts knowingly designed to impede or destroy Scientology or Scientologists is what is meant by acts suppressive of Scientology or Scientologists.

The greatest good for the greatest number of dynamics requires that actions destructive of the advance of the many, by Scientology means, overtly or covertly undertaken with the direct target of destroying Scientology as a whole, or a Scientologist in particular, be summarily handled due to the character of the reactive mind and the consequent impulses of the insane or near insane to ruin every chance of mankind via Scientology.

POTENTIAL TROUBLE SOURCE

A Scientologist connected by familial or other ties to a person who is guilty of suppressive acts is known as a potential trouble source or trouble source. The history of Dianetics [illegible] Scientology is strewn with th[illegible] Confused by emotional ties, dogged in refusing to give up Scientology, yet invalidated by a suppressive person at every turn, they cannot, having a PTP, make case gains. If they would act with determination one way or the other—reform the suppressive person or otherwise standardly handle the situation—they could then make gains and recover their potential. If they make no determined move, they eventually succumb.

Therefore, this policy letter extends to suppressive non-Scientology wives and husbands and parents, or other family members or hostile groups or even close friends. So long as a wife or husband, father or mother or other family connection, who is attempting to suppress the Scientology spouse or child, or hostile group remains continuingly acknowledged or in communication with the Scientology spouse or child or member, then that Scientologist or preclear comes under the *family* or *adherent* clause and may not be processed or further trained until he or she has taken appropriate action to cease to be a potential trouble source.

The validity of this policy is borne out by the fact that the US government raids and other troubles were instigated by wives, husbands or parents who were actively suppressing a Scientologist or Scientology or who were acting under the influences of persons or agencies who had deliberately misinformed them regarding Scientology. The suppressed Scientologist did not act in good time to avert the trouble by handling the antagonistic family member.

Any processing of the potential trouble source is denied or illegal while the connection exists, and a person not actively seeking to settle the matter may be subjected to a Committee of Evidence if processed meanwhile.

POTENTIAL TROUBLE SOURCES AND DISCONNECTION

The subject and technology of "disconnection" is thoroughly covered in HCOB 10 Sept. 83, PTSness AND DISCONNECTION, and in the basic technical materials referenced therein.

Unwarranted or threatened disconnection has the recourse of the person or group being disconnected from requesting a Committee of Evidence from the nearest convening authority (or HCO) and producing to the committee any evidence of actual material assistance to Scientology without reservation or bad intent. The committee must be convened if requested.

The real motives of suppressive persons have been traced to quite sordid hidden desires—in one case the wife wanted her husband's death so she could get his money and fought Scientology because it was making the husband spiritually well. Without handling the wife or the connection with the woman, the Scientologist, as family, drifted on with the situation, and the wife was able to cause a near destruction of Scientology in that area by false testimony to the police and government and press. Therefore, this is a serious thing—to tolerate or remain connected to a source of active suppression of a Scientologist or Scientology without standardly handling or acting to expose the true motives behind the hostility and reform the person. No money particularly may be accepted as fee or loan from a person who is "family" to a suppressive person and therefore a potential trouble source. There is no source of trouble in Scientology's history greater than this one for frequency and lack of attention.

Anyone absolved of [illegible]ppressive acts by an amnesty [illegible] Committee of Evidence ceases to be declared suppressive. Anyone found guilty of suppressive acts by a Committee of Evidence and its convening authorities remains declared unless saved by an amnesty.

This policy letter is calculated to prevent future distractions of this nature as time goes on.

RIGHTS OF A SUPPRESSIVE PERSON OR GROUP

A truly suppressive person or group has no rights of any kind as Scientologists.

However, a person or group may be falsely labeled a suppressive person or group. Should the person or group claim the label to be false, he, she or they may request a Committee of Evidence via their nearest Continental Justice Chief. The executive with the power to convene a Committee of Evidence must do so if one is requested for recourse or redress of wrongs.

The person or representative of the group labeled suppressive is named as an interested party to the committee. They attend it where it convenes.

The committee must pay attention to any actual evidences that the person or group that is accused of being suppressive may produce, particularly to the effect of having helped Scientology or Scientologists or a Scientologist, and if this is seen to outweigh the accusations, proof or lack of it, the person is absolved.

Any knowingly false testimony, forgeries or false witnesses introduced by the person or group accused of being suppressive can result in an immediate finding against the person or group.

Any effort to use copies of the testimony or findings of a Committee of Evidence called for this purpose or holding it to scorn in a civil court immediately reverses any favorable finding and automatically labels the person or group suppressive.

If the findings, as passed upon by the convening authority and the International Justice Chief, demonstrate guilt, the person or group is so labeled as a suppressive person or group.

Failing to prove guilt of suppressive acts, the committee must recommend to absolve the person or group publicly.

When a person, by some circumstance, has been incorrectly declared, then *after* he has had a Committee of Evidence and the Suppressive Person Declare Order has been cancelled, he may, if he wishes, request a Board of Review who, upon full review of the matter, may if warranted ask for the return of lost pay or status the person may have experienced while incorrectly declared a suppressive person. (Ref: HCO PL 23 Feb. 78R, BOARD OF REVIEW)

RECOURSE OF A POTENTIAL TROUBLE SOURCE

A person labeled a potential trouble source and so barred from receiving auditing, may request a Committee of Evidence of the nearest Continental Justice Chief via HCO as recourse if he or she contests the allegation.

The Committee of Evidence requested must be convened vening authority.

If evidences of disconnection are given, the Committee of Evidence findings and recommendations and the convening authority, once the findings are duly approved, must remove the label of potential trouble source from the Scientologist. If the alleged suppressive person or group is clearly and beyond reasonable doubt shown not to be guilty of suppressive acts or is shown clearly to have reformed, the Committee of Evidence must recommend removal of the label suppressive person or group from the suspected person or group. However, once a person or group has been declared suppressive by an authorized, published order, the removal or lifting of the declare order or label must be approved by the International Justice Chief.

But should the former potential trouble source's state of case show no gain after reasonable time in processing, any executive of Division 4 (Training and Processing) may order a new Committee of Evidence in the matter, and if it and its convening authority recommend to reverse the former findings, and if such findings are approved on International Justice lines, the labels are applied. But no auditor may be disciplined for auditing either during the period between the two findings.

RECOURSE OF AN AUDITOR

An auditor disciplined for processing a potential trouble source or a suppressive person or a member of a suppressive group may request a Committee of Evidence if he can persuade the potential trouble source and the suppressive person or a representative of the suppressive group to appear before it.

The auditor so requesting may also have named as an interested party or parties with himself the person or persons who supplied the information or misinformation concerning his actions.

No damages or costs may be borne by or ordered by a Committee of Evidence in cases involving potential trouble sources or suppressive persons or groups.

When the potential trouble source or suppressive person or group representative fails to appear before a Committee of Evidence on a bill of particulars labeling persons as potential trouble sources or suppressive persons or groups at the published time of its convening, the bill of particulars stands as proven and the convening authority is bound so to declare.

EVIDENCE OF DISCONNECTION

Any HCO Secretary may receive evidences of disconnection or disavowal and, on finding them to be bona fide, must place copies of such evidences in the ethics file and in the CF folders of all persons named in them.

The disconnecting person then ceases to be a potential trouble source (once any additional PTS handling of a technical nature required by the Case Supervisor has been successfully completed).

The procedure fo[illegible]ecanting suppressive person o[illegible]oup is outlined above.

EVIDENCES OF SUPPRESSION

It is wise for any Scientologist, HCO Secretary or Committee of Evidence in matters concerning suppressive acts to obtain valid documents, letters, testimonies duly signed and witnessed, affidavits duly sworn to and other matters and evidences which would have weight in a court of law. Momentary spite, slander suits, charges of Scientology separating families, etc., are then guarded against.

If matters concerning suppressive acts are given good and alert attention, properly enforced, they will greatly accelerate the growth of Scientology and bring a new calmness to its people and organizations and far better case gains where they have not heretofore been easy to achieve.

Preclears with present time problems, ARC broken with associated but suppressive persons, will not obtain case gains but on the contrary may experience great difficulty.

Observance of these facts and disciplines can help us all.

Nothing in this policy letter shall ever or under any circumstances justify any violation of the laws of the land or intentional legal wrongs. Any such offense shall subject the offender to penalties prescribed by law as well as to ethics and justice actions.

L. RON HUBBARD
Founder

Revision assisted by
LRH Technical Research
and Compilations

M.

7355

SEA ORGANIZATION

FLAG CONDITIONS ORDER 6664R

18 February 1982
Revised 22.4.82

Armstrong
PFL, [✓ DEFT] EXHIBIT 10
WIT: Farny
PENNY L. GILMORE, Reporter
7-12-94

SUPPRESSIVE PERSON DECLARE

GERRY ARMSTRONG

GERRY ARMSTRONG, now of Costa Mesa, California, is hereby DECLAR A SUPPRESSIVE PERSON according to HCO PL 7 Dec 76 LEAVING AND LEAVES:

"Where a person is secretly planning to leave and making private preparations to do so without informing the proper terminals in an or and does leave (blow) and does not return within a reasonable length of time an automatic Declare is to be issued."

Gerry took an unauthorized leave in December 1981 and has refuse to return and route out properly although he has been contacted and repeatedly requested to do so.

Since Gerry was declared on 18 Feb 1982, reports have been made that also bring the following charges against him for Crimes and High Crimes and Suppressive Acts against the Church:

1. THEFT.
2. ILLEGALLY TAKING OR POSSESSING CHURCH PROPERTY.
3. RESELLING ORG MATERIEL FOR PRIVATE GAIN.
4. IMPERSONATING A SCIENTOLOGIST OR STAFF MEMBER WHEN NOT AUTHORIZE
5. FALSIFYING REPORTS.
6. MAKING OUT OR SUBMITTING OR ACCEPTING FALSE PURCHASE ORDERS.
7. JUGGLING ACCOUNTS.
8. OBTAINING LOANS OR MONEY UNDER FALSE PRETENSES.
9. ISSUING THE DATA OR INFORMATION OR INSTRUCTIONAL OR ADMINISTRATI PROCEDURES WITHOUT CREDIT OR FALSELY ASSIGNING CREDIT FOR THEM TO ANOTHER.
10. ENGAGING IN MALICIOUS RUMOUR-MONGERING TO DESTROY THE AUTHORITY OR REPUTE OF HIGHER OFFICERS OR THE LEADING NAMES OF SCIENTOLOGY OR TO "SAFEGUARD" A POSITION.

11. SEEKING TO SPLINTER OFF AN AREA OF SCIENTOLOGY AND DENY IT PROPER CONSTITUTED AUTHORITY FOR PERSONAL PROFIT, PERSONAL POWER OR "TO SAVE THE ORGANIZATION FROM THE HIGHER OFFICERS OF SCIENTOLOGY."

12. PRONOUNCING SCIENTOLOGISTS GUILTY OF THE PRACTICE OF STANDARD SCIENTOLOGY.

13. WILLFUL LOSS OR DESTRUCTION OF CHURCH PROPERTY.

14. HOLDING SCIENTOLOGY MATERIALS OR POLICIES UP TO RIDICULE, CONTEMP OR SCORN.

15. SPREADING DESTRUCTIVE RUMOURS ABOUT SENIOR SCIENTOLOGISTS.

16. PRETENDING TO EXPRESS A MULTIPLE OPINION (USE OF "EVERYBODY") IN VITAL REPORTS.

17. BEING A KNOWING ACCESSORY TO A SUPPRESSIVE ACT.

18. FAILURE TO HANDLE OR DISAVOW AND DISCONNECT FROM A PERSON DEMONSTRABLY GUILTY OF SUPPRESSIVE ACTS.

Since Gerry Armstrong left the Church, he has falsely represented himself to others and said he was on a "secret mission." Representing himself then as a staff member, he then misrepresented the actions of the Church and its members [illegible] others. Gerry has chronically misrepresented himself and others.

M

He has spoken out for LSD and LSD-proponent Timothy Leary knowing full well that such illicit drugs are strictly prohibited by the Church and that Church Founder L. Ron Hubbard has written against their usage or promotion due to their destructive nature. Knowing that LRH also has researched and written how to combat the effects of these illicit drugs, Gerry Armstrong has degraded LRH's research and prefers to promo the research of Timothy Leary.

Gerry has taken and sought to sell Church property. He has also failed to return Church property he obtained. He also falsified his Church financial records by failing to state the nature of the intended purchases and failing to spend the money for the approved items. Recor by him show purchases for personal items as well as covering the expens of non-Church companies.

Gerry was also found to be promulgating false information about th Church, its Founder and members. He used his position to create and transmit erroneous information under the guise of "documentation." Altered documents have been found in his area.

Should Gerry Armstrong come to his senses and wish to recant, he should apply steps A-E of HCO PL 16 May 80 III ETHICS, SUPPRESSIVE ACTS SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS. Should he fail to apply these steps he will be expelled from the Church and be debarred. Shoul he claim the label or the charges to be false, he may request a Committ of Evidence per the above referenced policy.

His only terminal is the Continental Justice Chief PAC.

PO1 Paul Laquerre
Int Justice Chief

Authorized by AVC

for the

CHURCH OF SCIENTOLOGY
INTERNATIONAL

CSI:AVC:PL:bk

Armstrong
PFF/DEFT EXHIBIT 13
WIT: Farny
PENNY L. GILMORE, Reporter
7-12-94

FLAG® ED 2830RB

25 July 1992

TO: ALL E/Os ALL ORGS AND MISSIONS

SUPPRESSIVE PERSONS AND SUPPRESSIVE GROUPS LIST

This issue is the list of declared suppressive persons and suppressive groups. It is for your use to safeguard the lines of your Org or Mission and to ensure that these individuals or members of these groups are not connected to or on lines at your Org or Mission in any way. Reference: HCO™ PL 23 December 1965RB, SUPPRESSIVE ACTS, SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS.

Updates of this list will be regularly circulated as per HCO PL 29 June 1968, ENROLLMENT IN SUPPRESSIVE GROUPS.

In case you have knowledge of any of the listed people being on lines in your org or on lines with any other Scientology® group or Scientologist™, please immediately let me know by telex with all data you have.

Also, in case you have any data that seems to conflict with any person being on this list, or any person that should be listed but is not, please contact me by telex with full specifics.

Sue Porter
INT JUSTICE CHIEF

Authorized by
AVC CMO INTERNATIONAL
EXTENSION UNIT

for
CHURCH OF SCIENTOLOGY
INTERNATIONAL

CSI:AVCIXU:SEP:sak

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Sue Porter
INT JUSTICE CHIEF

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CSI:AVCIXU:SEP:sak

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ATTACHMENT

• ELMIRA
• E-METER THERAPY
• ENLIGHTENMENT INTENSIVES
• ESSENCE OF LIFE
ESOTERIC RESEARCH AND EDUCATION FOUNDATION
  a.k.a. CENTER FOR ESOTERIC PSYCHOLOGY, THE
ESOTERIC RESEARCH FOUNDATION
  a.k.a. CENTER FOR ESOTERIC PSYCHOLOGY, THE

EST (ERHARD SEMINAR TRAINING):
EST PHOENIX AREA CENTER
EST LA AREA CENTER
EST NEW PORT BEACH AREA CENTER
EST SACRAMENTO AREA CENTER
EST SAN DIEGO AREA CENTER
EST SAN FRANCISCO AREA CENTER
EST SAN JOSE AREA CENTER
EST DENVER AREA CENTER
EST CONNECTICUT AREA CENTER
EST WASHINGTON DC AREA
EST MIAMI AREA CENTER
EST SARASOTA AREA CENTER
EST TAMPA AREA CENTER
EST ATLANTA AREA CENTER
EST HAWAII AREA CENTER
EST CHICAGO AREA CENTER
EST NEW ORLEANS AREA CENTER
EST BOSTON AREA CENTER
EST DETROIT AREA CENTER
EST MINNEAPOLIS/ST PAUL AREA CENTER
EST NEW JERSEY AREA CENTER
EST ALBUQUERQUE AREA CENTER
EST NEW YORK AREA CENTER
EST CHARLOTTE AREA CENTER
EST CINCINNATI AREA CENTER
EST CLEVELAND AREA CENTER
EST PORTLAND AREA CENTER
EST PHILADELPHIA AREA CENTER
EST PITTSBURGH AREA CENTER
EST DALLAS AREA CENTER
EST HOUSTON AREA CENTER
EST SEATTLE AREA CENTER
EST WEST COAST SITE (SANTA ROSA, CALIFORNIA)

• EUNLITICS
• EXCALIBUR
• EXEGESIS
• FAST CLEARING
• FELLOWSHIP OF CLEAR LIGHT
• FELLOWSHIP OF CLEARING CONSULTANTS
• FIELD, THE
• FIELD GROUP, THE
FORENINGEN FOR ANVENDT FILOSOFI
  (Association for applied philosophy)
• FORENINGER FOR TILLAEMPAD FILOSOFI
•   (Association of applied philosophy)
FORUM, THE
FOUNDATION OF ADVANCED ABILITIES
• FOUNDATION CHURCH OF THE MILLENIUM, THE
FREE ZONE SCIENTOLOGY
  a.k.a. CREATIVE LEARNING CENTER
• FRIENDS OF THE 1ST AMENDMENT
• GALACTIC PATROL
• GENERAL PSYONIC
GESTALT INSTITUTE
• GREEN CLUB
GROWING OLDER, INC.
HARMONISTICS
• HARMONY WORKSHOP
• HARTFORD CENTER
• HEALTH AND ABILITY CENTER BRIGHTON
HERMANET
HIGHTONE INTERVIEWS
HOLISTIC CENTER FOR HIGHER AWARENESS
HOLLYWOOD DIANETICS
  a.k.a. CALIFORNIA ASSOCIATION OF DIANETIC
      AUDITORS (CADA)
• HOLY ORDER OF MANS
• HONEY DROP FOUNDATION
• HUB, THE
HUBBARD DIANETIC CONTROL CENTER
  a.k.a. HOLLYWOOD DIANETICS
• HUMAN INSIGHT GROUP
HUMAN POTENTIAL CENTER
• HUMAN POTENTIAL MOVEMENT
• HUNA RESEARCH ASSOCIATES
HUNGER PROJECT, THE
I AM

• INSTITUTE OF PSYCHOLOGY & PARAPSYCHOLOGY
• INTERNATIONAL AWARENESS CENTER
INTERNATIONAL COMMUNICATION NETWORK
INTERNATIONAL DIANETIC SOCIETY, INC.
  a.k.a. HOLLYWOOD DIANETICS
INTERNATIONAL SOCIETY OF INDEPENDENTS
INTROSPECTIVE TECHNOLOGY SERVICES
INTUITOLOGY
ISM OF AM
KRIPALU SCHOOL OF SAHAJ YOG
KENJA
  a.k.a. KENJA PERSONAL ABILITY CENTRE AND PERSONAL
      EVOLVEMENT CENTRE
• LEAGUE FOR SPIRITUAL DISCOVERY
• LIFE AID
LIFE ARTS CENTER
  a.k.a. CHURCH OF SCIOLOGOS
  a.k.a. CENTER FOR ADVANCEMENT OF HUMAN POTENTIAL
• LIFE DYNAMICS
LIFE MANAGEMENT TRAINING CENTER
• LIFE REPAIR
LIFESPRING
LIFE TECH, INC.
  a.k.a. LIFE TEK
• LIVING LOVE CENTER
LONDON INDEPENDENT AUDITORS NETWORK
• M-TECH
• MAJKEN, LILLIAN AND CO.
• MENTAT SCHOOL INC., THE
• METCALF GROUP
• MIAMI ABILITY CENTER
•   a.k.a. CHURCH OF SPIRITUAL ADVANCEMENT
MIND CLEARING
MIND DYNAMICS
MIND EXPANSION
• MIND SCANNING
• MIND SPA, THE
MOREHOUSE
MOTIVATIONS BERATUNG SCHNITZLER
  (Organization motivation center)
• MUNA
• NATURAL LEARNING CENTER
NATURALISM
• NEW PRINCIPLES
• NEXUS NEW AGE CIVILIZATION CENTER
• NIMDIN OVERSPACE FELLOWSHIP
• NORMANOLOGY
•   a.k.a. POWER
NOUVEAU MIND CENTER
NOW SALES TRAINING
• OMEGA TRAINING
•   a.k.a. OMEGA CONSULTANT TRAINING
•   a.k.a. OMEGA CLEARING
• ONTOLOGY
•   a.k.a. UNIVERSAL INSTITUTE OF APPLIED ONTOLOGY
OPERATION SAFESPACE
ORGANIZATION MOTIVATION CENTER
ORIENTOLOGY
• O.T. ASSOCIATES
• OT CENTRAL COMMITTEE WORLD WIDE
• PACE PROGRAM
PALO ALTO ABILITY CENTER
PARADIGM TECHNOLOGIES
  a.k.a. CENTER OF ADVANCED BUSINESS CONCEPTS
PERSONAL ACTUALISATION TRAINING (PAT)
PERSONAL COUNSELORS, INC.
PERSONAL CREATIVE FOUNDATION
• PERSONAL CREATIVE FREEDOM FOUNDATION
• PERSONAL DEVELOPMENT TRAINING
PERSONAL EFFICIENCY CENTER
PERSONAL POWER AND TRAINING CENTER
• PERSONAL INTEGRATION THERAPY
• PHILBERT
• POSSUM PROCESS
• POWER
•   a.k.a. NORMANOLOGY
• POWER PROCESSING
POWER LEADERSHIP INTERNATIONAL
• PRIMAL SCREAM
•   a.k.a. PRIMAL THERAPY
PRIMAL FEELING CENTER OF NEW ENGLAND
PROCESS, THE
  a.k.a. PROCESS CHURCH OF THE FINAL JUDGMENT
• PROCESS CHURCH
• PROJECT SAFESPACE
•   a.k.a. SAFESPACE
PROMETEO GROUP
• PROSPEROS, THE
• PROSPEROUS INNER SPACE CENTER

EST (ERHARD SEMINAR TRAINING):
EST PHOENIX AREA CENTER
EST LA AREA CENTER
EST NEW PORT BEACH AREA CE.
EST SACRAMENTO AREA CENTER
EST SAN DIEGO AREA CENTER
EST SAN FRANCISCO AREA CENTER
EST SAN JOSE AREA CENTER
EST DENVER AREA CENTER
EST CONNECTICUT AREA CENTER
EST WASHINGTON DC AREA
EST MIAMI AREA CENTER
EST SARASOTA AREA CENTER
EST TAMPA AREA CENTER
EST ATLANTA AREA CENTER
EST HAWAII AREA CENTER
EST CHICAGO AREA CENTER
EST NEW ORLEANS AREA CENTER
EST BOSTON AREA CENTER
EST DETROIT AREA CENTER
EST MINNEAPOLIS/ST PAUL AREA CENTER
EST NEW JERSEY AREA CENTER
EST ALBUQUERQUE AREA CENTER
EST NEW YORK AREA CENTER
EST CHARLOTTE AREA CENTER
EST CINCINNATI AREA CENTER
EST CLEVELAND AREA CENTER
EST PORTLAND AREA CENTER
EST PHILADELPHIA AREA CENTER
EST PITTSBURGH AREA CENTER
EST DALLAS AREA CENTER
EST HOUSTON AREA CENTER
EST SEATTLE AREA CENTER
EST WEST COAST SITE (SANTA ROSA, CALIFORNIA)

• EUHLNTICS
• EXCALIBUR
• EXEGESIS
• FAST CLEARING
• FELLOWSHIP OF CLEAR LIGHT
• FELLOWSHIP OF CLEARING CONSULTANTS
• FIELD, THE
• FIELD GROUP, THE
FORENINGEN FOR ANVENDT FILOSOFI
  (Association for applied philosophy)
• FORENINGER FOR TILLAEMPAD FILOSOFI
•   (Association of applied philosophy)
FORUM, THE
FOUNDATION OF ADVANCED ABILITIES
• FOUNDATION CHURCH OF THE MILLENIUM, THE
FREE ZONE SCIENTOLOGY
  a.k.a. CREATIVE LEARNING CENTER
• FRIENDS OF THE 1ST AMENDMENT
• GALACTIC PATROL
• GENERAL PSYONIC
GESTALT INSTITUTE
• GREEN CLUB
GROWING OLDER, INC.
HARMONISTICS
• HARMONY WORKSHOP
• HARTFORD CENTER
• HEALTH AND ABILITY CENTER BRIGHTON
HERMANET
HIGHTONE INTERVIEWS
HOLISTIC CENTER FOR HIGHER AWARENESS
HOLLYWOOD DIANETICS
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      AUDITORS (CADA)
• HOLY ORDER OF MANS
• HONEY DROP FOUNDATION
• HUB, THE
HUBBARD DIANETIC CONTROL CENTER
  a.k.a. HOLLYWOOD DIANETICS
• HUMAN INSIGHT GROUP
HUMAN POTENTIAL CENTER
• HUMAN POTENTIAL MOVEMENT
• HUNA RESEARCH ASSOCIATES
HUNGER PROJECT, THE
I AM
IF
• IMPROVEMENT GAME, THE
• INDEPENDENT LEGAL FUND
• INDEPENDENT RELIGIOUS SERVICE ASSOCIATION, THE
• INDEPENDENT SCIENTOLOGISTS IN SUNDERLAND
•   a.k.a. CLEAR CENTER SUNDERLAND
INDEPENDENTS SFO
INNER SPACE CENTER
• INSIGHT DYNAMICS
INSTITUT FUR ANGEWANDTE KOMMUNIKATION
  a.k.a. ABILITY CENTER VIENNA
• INSTITUT FUR BEWISSTSEINS FORSCHUNG
•   (Institute for mental research)
INSTITUTE FOR APPLIED COMMUNICATION
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  HUMAN BEINGS
• INSTITUTE FOR PERSONAL EXCELLENCE
• INSTITUTE FOR PERSONNEL ENHANCEMENT
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INSTITUTE OF ABILITY
INSTITUTE OF ACTUALIZATION
• INSTITUTE OF ADVANCED PERCEPTION
• INSTITUTE OF APPLIED TECHNOLOGY
INSTITUTE OF HUMAN ABILITIES
  a.k.a. MOREHOUSE
  a.k.a. TURN ON TO AMERICA
• INSTITUTE OF INTERPERSONAL COMMITMENT
INSTITUTE OF PAST LIFE THERAPY

ISH OF AR
KRIPALU SCHOOL OF AHAJ YOG
KENJA
  a.k.a. KE E AL ABILITY CENTRE AND PERSONAL
      EVC ENT CENTRE

• LEAGUE FOR SPIRITUAL DISCOVERY
• LIFE AID
LIFE ARTS CENTER
  a.k.a. CHURCH OF SCIOLOGOS
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LIFE MANAGEMENT TRAINING CENTER
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LIFE TECH, INC.
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MIND DYNAMICS
MIND EXPANSION
• MIND SCANNING
• MIND SPA, THE
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• POSSUM PROCESS
• POWER
•   a.k.a. NORMANOLOGY
• POWER PROCESSING
POWER LEADERSHIP INTERNATIONAL
• PRIMAL SCREAM
•   a.k.a. PRIMAL THERAPY
PRIMAL FEELING CENTER OF NEW ENGLAND
PROCESS, THE
  a.k.a. PROCESS CHURCH OF THE FINAL JUDGMENT
• PROCESS CHURCH
• PROJECT SAFESPACE
•   a.k.a. SAFESPACE
PROMETEO GROUP
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• PROSPEROUS INNER SPACE CENTER
• PSI-WORLD
• PSYCHIC SPIRITUAL ADVANCEMENT
• RANDOMITY
• READING RESEARCH COUNCIL
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•   a.k.a. CENTER FOR REALIZATION OF CREATIVE POTENTIAL
RE-EVALUATION COUNSELLING APPLIED PHILOSOPHY
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•   a.k.a. DIANOLOGY
• REFORMED CHURCH OF SAN DIEGO
• REFORM CHURCH OF SCIENTOLOGY
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• REVITALIZATION CENTER
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• SCHOOL OF SACRED SCIENCE
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• SELF EXPERIENCE AUDITING
• SELF PURSUIT
• SELF REALIZATION
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SELF TRANSFORMATION
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  a.k.a. SYNERGETICS
  a.k.a. SYNERGOS PSI
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• THETA COMMUNICATIONS
• THETA INTERNATIONAL
• THETA SEATTLE
• TOGETHER TRAINING
TOTALITY
• TRAINING OF NEW MEXICO
• TRANSCENDENTAL DIANETIC
• TRICHOTOMY
• TRINITOLOGY
• TRIOLOGY
TURN ON TO AMERICA
  a.k.a. INSTITUTE OF HUMAN ABILITIES
• UNIVERSAL CHURCH OF ETERNAL PHETAN
• UNIVERSAL INSTITUTE OF APPLIED ONTOLOGY
•   a.k.a. ONTOLOGY
• VACUUM CLEANING PROCEDURE
• VICTORIAN COLLEGE OF ESOTERIC STUDIES
• VIPERS
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WERNER ERHART AND ASSOCIATES
• WHOLE TRACK DESIGNS
WINNINGS ADVANCED MANAGEMENT TECHNOLOGY
  a.k.a. ABILITY CENTER VIENNA
• WISDOM SCHOOL
• WORLD SOCIETY FOR EVERYMAN'S FREEDOM
• WUD-SHA-LO
• YES
• YMI
ZENITH APPLIED PHILOSOPHY (ZAP)

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ABEGG, PAUL
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ABERG, VALLE
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ACS, GABE
ACS, KENNY
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ADAMI, VITO
ADAMS, BRENDA
ADAMS, CHUCK
ADAMS, GERALD
ADAMS, KARIN
ADAMS, MARY LUELLA
ADAMS, MICK
ADAMS, RODNEY
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ADLER, BARRY
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ALLEN, TIM
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ALLMARAS, LINDA
ALLOI, ROGER
ALMARAZ, DAVE
ALMBLAD, ROBERT
ALPEN, CINDY
ALPIN, MICK
ALPIN, VAL
ALVAREZ, ALEJANDRO
ALVAREZ, GEORGE
ALVAREZ, JOSE
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ANDALUS, ALFREDO
ANDERSON, BORJE
ANDERSON, EDYTHE
ANDERSON, JAMES
ANDERSON, KIM
ANDERSON, MARILYN
ANDERSON, PAUL
ANDERSSON, MONIKA
ANDRAE, RANDALL
ANDREU, GEORGES
ANDREWS, ROBYN (LAVEGLIA)
ANDRUS, ALISON LOUISE
ANSTRIN, LISA
ARGUE, MIKE
ARIANA, MARIO
BAILEY, TURC
BAKER, MARK
BAKER, NEIL
BALDIZON, GERMAN DANIEL
BALLARD, ERIC
BAMIRO, ADENIYI
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BARBARO, PAUL
BARDEN, ERIC
BARBEN, MARIA
BARBER, DAN
BARBER, GLEN
BARBERO, ENRICA
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BARBOSA, DAVID
BAREA, IDA
BARGER, DALE
BARKER, BRIAN
BARNES, GARY
BARNETT, SUE
BARNEY, CARL
BARRON, DAVID
BARROW, CYRIL
BARRY, KIM
BARTON, JACK
BARTON, NOEL
BENTZ, ORLANDO
BERGERON, GHISLAINE M.
BERNARD, DOMINIQUE M.
BERNARD, HELENA
BERNDTSSON, BARBRO
BERRY, BRITA
BERTINATO, GINA
BERTOJA, ELISABETH
BESKE, CINDY
BETTENDORF, DANIEL JOHN
BHARGAV, SUHAS
BIDSTRUP-LARSEN, FRANK
BILLINGS, SHIRLEY
BINDA, DJ
BINDA, MIKE TERRANCE
BIBBY, STEVE
BISHOP, BONNY
BISHOP, BRUCE
BLACKWOOD, DAVID
BLANCHET, MANON
BLOCK, TERRY
BLUM, PETER
BOCK, SHELLY
BODINIER, FRANCOIS
~~BOEHM, ESTHER~~
BOLDEN, SHERRY ANN
BOLINGER, TRUMAN
BOLTON, LEN

• SHAKTI
SHAKTI-PAT
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ADEN, DAVID (MARTIN)
ADLER, BARRY
AFGHANI, USOMA
AHMED, HAMID
AILLS, RITA
AKESSON, KAJ
AKESSON, LENA
AKITA, ANGEL RAMIREZ
ALACK, JOHN
ALBA, RENE
ALBACH, BARBARA
ALBACH, JANELL
ALBARCARA, JAIME
ALBER, ERWIN
ALDER, VIRGINIA
ALDRICH, CYNTHIA
ALEXANDER, GERALD
ALEXANDER, JOHN
ALEXANDER, PAUL
ALLA, MIKE
ALLARD, JOHN
ALLEMAN, BRIAN
ALLEMAN, JAN
ALLEMAN, STEVE
ALLEN, CHRISTOPHER
ALLEN, DON
ALLEN, JIM
ALLEN, MARCUS
ALLEN, NETTA
ALLEN, PAT
ALLEN, TIM
ALLEVI, LIDIA
ALLMARAS, LINDA
ALLOI, ROGER
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ANSTRIN, LISA
ARGUE, MIKE
ARIANA, MARIO
ARMISTEAD, TOM
ARMSTRONG, GERRY
ARMSTRONG, MIKE
ARMSTRONG, SUE
ARNOLD, PETER
ARNOLD, SHELLY
ASKEW, CARL
ASKEW, MORGAN
ATACK, JON
AU, AMY
AUERBACH, CASS
AUERBACH, DAN
AUSLEY, JOHN
AVALLE, ANGELA
AXLEBY, RODNEY
AZARES, BECKY
AZNARAN, RICK
AZNARAN, VICKI
BAABAA, MAHFO
BAABAA, ANN
BADENDREIE
BACKMAN, [illegible] N RAMSEY
BACON, ART
BADE, JOHN
BAER, CHRIS
BAGLEY, KATHY
BAILEY, MIKE
BAILEY, TURC
BAKER, MARK
BAKER, NEIL
BALDIZON, GERMAN DANIEL
BALLARD, ERIC
BAMIRO, ADENIYI
BANGERT, BAMIRO MITCH
BANKSTON, PEGGY
BARAKAT, TERRY
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BARDEN, ERIC
BARBEN, MARIA
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BARBER, GLEN
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BARBIER, JEAN LUC
BARBOSA, DAVID
BAREA, IDA
BANGER, DALE
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BARRON, DAVID
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BOURGOIN, GUY CAMIL
BOUZARZAR, JULIE

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BOX, RALPH
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BURK, LARRY DON
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BURNETT, RICHARD
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BURROWES, SARAH
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BUTLER, BILL
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BYNIE, CHRIS
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CAGLE, DEBBIE
CALDAGNETTO, SABINA
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CALDWELL, NICKI
CALLEGARINI, FAUSTO
CALVO, SYLVIE
CAMAS, CLAUDIA
CAMAS, WALTER
CANUTI, GIANNI
CAPONALE, FRANK
CAPUTO, PIERO
CAPUTO, RICARDO
CARAZO, FERNANDO
CARIOTAKI, CATHY
CARLISLE, CRICKET
CARLSEN, CARL
CARLSEN, HOLLY
CARMONA, HECTOR
CARNEY, SHERI
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CARRIERE, CHANTAL
CARRIERE, FRANCOIS
CARTER, TERI
CASE, AMY
CASILLAS, ED
CASSAN, CHANTAL
CASSISA, PETER MARTIN
CASTILLO, ALEX
CASTILLO, MAUDE

CHICLACOS, CHIC
CHIECO, MICHELE
CHILDS, PETER
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CHRISTOPHER, DAVE
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CISNEROS, MARIO
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CLARK, FRANKIE
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CLARK, LOTTA
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CLIFFORD, SCOTT
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COHEN, VIRGINIA
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COLOSIMO, CARLO
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CONNORS, NOEL
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CONWAY, JILL
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COOK, YVONNE
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COOPER, DARYL
COOPMAN, GEORGE
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CORDOVA, CARLOS
CORTEZ, DAVID
CORYDON, BENT
CORYDON, MARY
COSTA, MONICA
COULTER, KEITH L.
COULTER, RITA DIANE
COVELL, JOHN
COVELL, SANDY
CRAGGS, DEREK
CRAMMER, LINDA
CRAMMER, TED
CREAMER, CECILIA
CREAMER, NEIL
CREEGAN, DANIEL
CRISTIAN, GUNTHER
CRITTENDON, CLAIRE
CRIVELLO, AL
CROSIGNANI, ALBERTO
CROSIGNANI, PAOLA
CROSSMAN, ELIZABETH
CROW, SCOTT
CROWDER, ROBERT
CROWIE, HARVEY
CROWIE, JASANNA
CRUNDALL, MARTIN
CRUZ, JESUS
CUBISOL, JEAN NOEL
CURL, GERRIE
CURREN, TERENCE
CURREN, TERRANCE
CUSWORTH, DAVID
CZAINZINGER, LEO
D'AGNELLI, GIANNI
D'AMATO, UGO
D'AMICO, TONY
D'AUBREY, DOUG
DABLIN, ANN MAI
DAGNEAU, MARC
DAILY, MICHAEL J.
DAL PRA, GABRIELLA
DALE, ROD
DALTON, JIM
DAN, DAFNA (ROBERTSON)
DANA, MICHELLE
DANIELE, RAGGI
DANIELS, EDO
DANMAN, TOD
DANTES, VERO
←DARE, BERNARD
DARE, CHRIS
DAROESMAN, PEGGY

DE JONG, MAUKJE
DE LUCHI, UGO
DE MARCHIA, ANTONELLA
DE MARCO, GIANCARLO
DE PETIGNY, BERTRAND
DE PETIGNY, MARIE THERESE
DE ROSA, DEBBIE
DE VITI, MARIA
DEAN, ATHENA
DEAN, CHUCK
DEARING, MICHAEL
DECARLE, BILL
DECHEFF, CHERYL
DECHEFF, GENE
DEITSCH, BILL
DELAUNAY, BRUNO
DELAY, ERIN
DELIA, MIKE
DELLOLIO, MICHELE
DENNING, KELLEN
DENNISON, MELISSA
DENNISON, REGINA
DENNISON, TERRY
DERENZO, OM
DEROCHA, EDWARD (EDDIE)
DESERRES, HELENE
DESMAIS, CLAUDINE
DEUTSCHER, SUE
DEXTER, DIANA
DEZELLE, ROCKY
DIANA, ENID
DIANNE, CLAUDE GUY
DICK, BRUCE
DICKMAN, DOUG
DICKSON, WOODY
DIEBACHER, HANS
DIEDRICHSEN, BENT
DILECCE, FRANCESCO
DILLEY, JOE
DINCALCI, JIM
DINCALCI, NANCY
DOBSON, MARK
DOERGES, .DAVE
DOHERTY, BETTY
DOHERTY, ELIZABETH FREW
DOMKE, DOUG
DONALD, SAM
DONOVAN, MOIRA
DOUGHERTY, PAMELA
DOUGLAS, KIMA
DOWNES, BRENDA
DOWNSBOROUGH, VIRGINIA
DREHER, MARION K.
DRENNEN, LORETTA
DRUMMOND, RON
DUBOIS, BERNIE (GUY)
DUBREIL, JEAN-PAUL
DUFOUR, TOM
DULZ, JOHN
DUMAS, FRANCOIS
DUNSICK, CHRIS (LARSON)
DUNCAN, MALCOM
DUNCAN, SYLVIA
DUNK, CHRIS
DUNLOP, DAVID
DUNN, AMY
DUNN, LARRY
DUNSTAN, MICHELE
DURNBERGER, MARGIT ADELE
DUTOIT, JUNE
DUTTON, MARK
DYER, JEANNE
DYERS, KEN
DYKEMA, EDWIN R.
EADE, DON
EARLE, GARY
EASTMAN, BARBARA
EASTMAN, MIKE
EDEN, TERRI
EDKINS, JACK
EDLER, RICH
EDMUNDSON, ANDREA
EDWARDS, JACKIE
EDWARDS, KEN
EGGER, PATRICIA
EIFLANDER, BERND
EISENRING, ALOIS JOSEPH
EISENRING, KATHERIN
EK, CURT
ELDER, RICHARD

ESCAMILLA, OSCAR
ESQUINAZ, URI
ESSLAND, LES
EUBANKS, DILLARD
EUENSCHWAND, ULRICH
EVALDSEN, FLEMMING
EVERETT, JON
EXANDER, PAUL
FADER, NANCY
FADER, RANDY
FABRIS, FREDERICA
FACCHINETTI, PAOLO
FAIER, MIRIT
FAIR, SALLY
FAIRBANKS, MURRAY
FAIRBANKS, SYLVIA
FALZON, ENZA
FARBER, EVANS W.
FAREED, ARIF
FARROW, JEFFERY KIM
FARROW, LESLIE ANNE
FARROW, MARY JANE
FARRU, CARLO
FASTERT, KATHY
FASTERT, PETE
FAU, RICARDO
FAULKNER, JACK
FEARON, GEORGE
FEHR, BRENDA
FEILD, RESHAD
FELDMAN, MICHAEL
FELDMESSER, ELISABETH
FELLI, ALLESSANDRO
FELLOWS, RAYMOND
FELTRIN, CLAUDE
FEMMINIS, ANTONELLA
FENTON, PENNY
FERRADJ, BELKACEM
FERREIRA, LOURDES
FERREIRA, MARC
FERRELL, JOHN
FERRER, ISABELLA
FERRERO, ALBERTO
FERRIS, EVAN
FERRO, JUANITA
FERRY, MONICA
FERRY, STEVE
FEUGA, OLIVIER
FIDSDALE, DR. BENT
FIEDLER, ANDREA
FIELDS, BRUCE
FILBERT, GEOFF
FILISKY, VALERIE (ORTMAN)
FILLER, MATT
FILREIS, JIM
FINCH, BETTY
FINDLAY, DAVID
FINDLAY, KIRSTEN
FINGERS, DAVE
FINLEY, DREW
FINLEY, MARTHA
FISCHER, JANET
FISCHER, RICHARD
FISHER, BETTY
FISHER, JOHN
FISHER, MARK CHRISTIAN
FISHER, PATTIE
FISHER, ROBERT WILLIAM
JAMES
FISHER, SUE
FISHMAN, GABRIELLE
FISHMAN, MARCUS
FISHMAN, STEVE
FJAL, JOHNNY
FJALL, KAIJA
FLEETHAM, SCOTT
FLETCHER, HOWARD (BUDDY)
FLOOD, PAM
FLORES, ANTONIO
FLORES, GUILLERMO
FLORIAN, GIOVANNA
FLORIDI, MARIO
FLOURNOY, JOHN
FLOWER, MARY
FLOWER, NICK
FOERSTEL, HELBERT (FURSTE
FOERSTEL, HELGA (FURSTEL)
FOIS, LAURA
FOIS, LUISA
FOLEY, INEZ

BOYER, LETA
BRADLEY, JOHN
BRADY, KEVIN GRANT
BRAGG, DARYL
BRAND, CARLA
BRANDENBURG, JEFF
BRANDES, CINDY
BRANDES, RICHARD
BREKKE, RON
BRICARD, MARIE CHRISTINE
BROD, TRACY
BRODIE, DANIELLE
BRODIE, DUNCAN
BRODIE, JILL
BROWN, CHRIS
BROWN, GAIL (GERDO)
BROWN, SCOTT
BROWNFIELD, JOE
BRUNEAU, DANIEL
BRUNELE, PAM
BRUSCHI, BRUNELLA
BRUZZONE, MAURIZIO
BUBKE, KEN
BUCCHI, GIACOMO
BUCHANAN, ALAN
BUCHANAN, EILEEN
BUCHANAN, SCOTT EVERETT
BUCHHEIM, BRAD
BUCKLES, CATHY
BUDD, SANDRA (BARNSLEY)
BURCH, DEBBIE
BURDEN, TONYA
BURDICK, GEORGE
BUREY, NICK
BURGESS, HELEN
BURK, LARRY DON
BURKE, GRETCHEN
BURNE, CHRIS
BURNETT, CARYL
BURNETT, RICHARD
BURROUGHS, EVA
BURROWES, SARAH
BURWELL, LYLE
BUSHLING, TINA
BUSHMAN, ED
BUSS, ANNIE (ELLIOT)
BUTLER, BILL
BUTLER, HAROLD
BYRNE, CHRIS
BYRNES, JANE
CABON, JOHN PAUL
CAGLE, DEBBIE
CALDAGNETTO, SABINA
CALDWELL, BRUCE
CALDWELL, NICKI
CALLEGARINI, FAUSTO
CALVO, SYLVIE
CAMAS, CLAUDIA
CAMAS, WALTER
CANUTI, GIANNI
CAPONALE, FRANK
CAPUTO, PIERO
CAPUTO, RICARDO
CARAZO, FERNANDO
CARIOTAKI, CATHY
CARLISLE, CRICKET
CARLSEN, CARL
CARLSEN, HOLLY
CARMONA, HECTOR
CARNEY, SHERI
CARNRITE, DAN
CARRARA, ROBERT
CARRIERE, CHANTAL
CARRIERE, FRANCOIS
CARTER, TERI
CASE, AMY
CASILLAS, ED
CASSAN, CHANTAL
CASSISA, PETER MARTIN
CASTILLO, ALEX
CASTILLO, MAUDE
CATANO, MIGUEL
CATANO, MIGUEL ALFONSO
CATHIE, ANGUS
CAUFIELD, JOE
CAULKINS, STEVE
CEBALLOS, ALVARO
CENEDELLA, LUIGI
CERNIGOI, SILVANO
CHADSEY, TERRY
CHAHAL, JESSE
CHALEFF, IRA
CHALMOT, NICOLE
CHAMBERLAIN, NEVILLE
CHAMBERS, BRETT
CHARLEBOIS, CHANG MARGIE
CHARLETON, PAM
CHASE, BERT
CHAUVET, JENNY
CHAVARRIA, JAVIER
CHAVARRIA, JOSE SALVADOR
CHAVARRIA, THERESE
CHEN, MURIEL
CHENIER, ED
CHERVIN, MARC
CHESNEY, CAROL
CHIARENZA, GIUSEPPINA
CHIARI, SILVIA

CLARK, KELI
[redacted]RK, LOTTA
RY, JIM
CLEMENTE, ISABELLE
CLIFFORD, SCOTT
COBURN, CAROL
COE, GURRY N.
COESSER, KEITH
COHEN, PAULETTE
COHEN, SHELLY
COHEN, VIRGINIA
COLEMAN, RICHARD
COLL, CONCHITA
COLLINS, JIM
COLOMBO, LUIGI
COLOSIMO, CARLO
CONAGHAN, MATTHEW JAMES
CONDRON, RON
CONNOR, DOUG
CONNORS, NOEL
CONRAD, LINDA
CONTRERAS, TERESA
CONWAY, JILL
COOK, GORDON
COOK, YVONNE
COONS, MARC
COOPER, DARYL
COOPMAN, GEORGE
CORDES, CHRIS
CORDOVA, CARLOS
CORTEZ, DAVID
CORYDON, BENT
CORYDON, MARY
COSTA, MONICA
COULTER, KEITH L.
COULTER, RITA DIANE
COVELL, JOHN
COVELL, SANDY
CRAGGS, DEREK
CRAMMER, LINDA
CRAMMER, TED
CREAMER, CECIIA
CREAMER, NEIL
CREEGAN, DANIEL
CRISTIAN, GUNTHER
CRITTENDON, CLAIRE
CRIVELLO, AL
CROSIGNANI, ALBERTO
CROSIGNANI, PAOLA
CROSSMAN, ELIZABETH
CROW, SCOTT
CROWDER, ROBERT
CROWIE, HARVEY
CROWIE, JASANNA
CRUNDALL, MARTIN
CRUZ, JESUS
CUBISOL, JEAN NOEL
CURL, GERRIE
CURREN, TERENCE
CURREN, TERRANCE
CUSWORTH, DAVID
CZAINZINGER, LEO
D'AGNELLI, GIANNI
D'AMATO, UGO
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DALTON, JIM
DAN, DAFNA (ROBERTSON)
DANA, MICHELLE
DANIELE, RAGGI
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DANMAN, TOD
DANTES, VERO
DARE, BERNARD
DARE, CHRIS
DAROESMAN, PEGGY
DAROSS, MARY
DASQUET, JULIA (DARCONDO)
DAVEY, ROD
DAVIDSON, DELWYN
DAVIDSON, MIKE
DAVIES, CHRISTOPHER L.
DAVIES, DR STEPHEN
DAVIS, ALICE
DAVIS, BREN'
DAVIS, CARM: T
DAVIS, CHRIS
DAVIS, DEB
DAVIS, JEFF
DAVIS, NICK STEPHEN
DAVIS, RO'
DAVIS, R DELL
DAVIS, E
DAVIS HEN
DAW ER
DE ONNEY
DE , RICHARD
DE BRABANDERE, PHILIPPE
DE FRETAS, MADELINE
DE GRASSI, ALESSANDRO
DE GROOT, LUIS
DE HOMBRE, ALF
DE JONG, ADRIAN

DEAN, CHUCK
DEARING, M HAE[redacted]
DECARLE,
DECHEFF, YL
DECHEFF, G E
DEITSCH, BILL
DELAUNAY, BRUNO
DELAY, ERIN
DELIA, MIKE
DELLOLIO, MICHELE
DENNING, KELLEN
DENNISON, MELISSA
DENNISON, REGINA
DENNISON, TERRY
DERENZO, OM
DEROCHA, EDWARD (EDDIE)
DESERRES, HELENE
DESHAIS, CLAUDINE
DEUTSCHER, SUE
DEXTER, DIANA
DEZELLE, ROCKY
DIANA, ENID
DIANNE, CLAUDE GUY
DICK, BRUCE
DICKMAN, DOUG
DICKSON, WOODY
DIEBACHER, HANS
DIEDRICHSEN, BENT
DILECCE, FRANCESCO
DILLEY, JOE
DINCALCI, JIM
DINCALCI, NANCY
DOBSON, MARK
DOERGES, .DAVE
DOHERTY, BETTY
DOHERTY, ELIZABETH FREW
DOMKE, DOUG
DONALD, SAM
DONOVAN, MOIRA
DOUGHERTY, PAMELA
DOUGLAS, KIMA
DOWNES, BRENDA
DOWNSBOROUGH, VIRGINIA
DREHER, MARION K.
DRENNEN, LORETTA
DRUMMOND, RON
DUBOIS, BERNIE (GUY)
DUBREIL, JEAN-PAUL
DUFOUR, TOM
DULZ, JOHN
DUMAS, FRANCOIS
DUMSICK, CHRIS (LARSON)
DUNCAN, MALCOM
DUNCAN, SYLVIA
DUNK, CHRIS
DUNLOP, DAVID
DUNN, AMY
DUNN, LARRY
DUNSTAN, MICHELE
DURNBERGER, MARGIT ADELE
DUTOIT, JUNE
DUTTON, MARK
DYER, JEANNE
DYERS, KEN
DYKEMA, EDWIN R.
EADE, DON
EARLE, GARY
EASTMAN, BARBARA
EASTMAN, MIKE
EDEN, TERRI
EDKINS, JACK
EDLER, RICH
EDMUNDSON, ANDREA
EDWARDS, JACKIE
EDWARDS, KEN
EGGER, PATRICIA
EIFLANDER, BERND
EISENRING, ALOIS JOSEPH
EISENRING, KATHERIN
EK, CURT
ELDER, RICHARD
ELGARDT, DOROTHY
ELIA, ADOLFO
ELIA, ROBERTO
ELISABETTA, BERTOJA
ELLESTON, MARSHA
ELLIOT: ANNIE (BUSS)
ELLIOT, JOHN
ELLIOT, LINK
ELLIOT, LYNN
ELLIOT, TOM
ELLIOTT, JOHN
ELLIS, TIM JAMES WILLIAM
ELLSWORTH, JENNY
ELTRINGHAM, HANNA (WHITFIELD)
ELY, TIM
ELZENGER, BERT
EMGART, LENNART
ENGELBRECHT, ANDRE
ENGLISH, HOWARD
ENNIS, SONYA
ENRIQUEZ, PEDRO
EPP, MARTA
ERHARD, WERNER
ERLICH, DENNIS
ERLICH, ROSA
ERNST, ED

FABER, RANDY
FABRIS, FREDERICA
FACCHINETTI, PAOLO
FAIER, MIRIT
FAIR, SALLY
FAIRBANKS, MURRAY
FAIRBANKS, SYLVIA
FALZON, ENZA
FARBER, EVANS W.
FAREED, ARIF
FARROW, JEFFERY KIM
FARROW, LESLIE ANNE
FARROW, MARY JANE
FARRU, CARLO
FASTERT, KATHY
FASTERT, PETE
FAU, RICARD
FAULKNER, JACK
FEARON, GEORGE
FEHR, BRENDA
FEILD, RESHAD
FELDMAN, MICHAEL
FELDMESSER, ELISABETH
FELLI, ALLESSANDRO
FELLOWS, RAYMOND
FELTRIN, CLAUDE
FEMMINIS, ANTONELLA
FENTON, PENNY
FERRAOJ, BELKACEM
FERREIRA, LOURDES
FERREIRA, MARC
FERRELL, JOHN
FERRER, ISABELLA
FERRERO, ALBERTO
FERRIS, EVAN
FERRO, JUANITA
FERRY, MONICA
FERRY, STEVE
FEUGA, OLIVIER
FIDSDALE, DR. BENT
FIEDLER, ANDREA
FIELDS, BRUCE
FILBERT, GEOFF
FILISKY, VALERIE (ORTMAN)
FILLER, MATT
FILREIS, JIM
FINCH, BETTY
FINDLAY, DAVID
FINDLAY, KIRSTEN
FINGERS, DAVE
FINLEY, DREW
FINLEY, MARTHA
FIRCHER, JANET
FISCHER, RICHARD
FISHER, BETTY
FISHER, JOHN
FISHER, MARK CHRISTIAN
FISHER, PATTIE
FISHER, ROBERT WILLIAM JAMES
FISHER, SUE
FISHMAN, GABRIELLE
FISHMAN, MARCUS
FISHMAN, STEVE
FJAL, JOHNNY
FJALL, KAIJA
FLEETHAM, SCOTT
FLETCHER, HOWARD (BUDDY)
FLOOD, PAM
FLORES, ANTONIO
FLORES, GUILLERMO
FLORIAN, GIOVANNA
FLORIDI, MARIO
FLOURNOY, JOHN
FLOWER, MARY
FLOWER, NICK
FOERSTEL, HELBERT (FURSTE
FOERSTEL, HELGA (FURSTEL)
FOIS, LAURA
FOIS, LUISA
FOLEY, INEZ
FORD, BRUCE
FORDE, PETER
FORSES, GRAHAM
FORSTNER, ROLAND
FOSDICK, BILL
FOSTER, LEWIS
FOSTER, MARK JULYAN
FOSTER, PATTY
FOUCHE, JOCELYNE
FOUCHE, KERRY
FOX, ANTHONY
FOX, DAVID
FOXNESS, SHIONA
FRACASSETTI, MARINA ERNES
FRACASSETTI, TIZIANO
FRANK, MARRIANNE
FRANKLIN, PAUL
FRANKLIN, PHYLLIS
FRANKS, BILL
FRANSISCO, ALFRED
FRANZ, KARIN
FRASSINETTI, MARCO
FRATTO, PINO JO
FREEDMAN, FRANKIE
FREEMAN, JOAN TARAKO
FREITAS, MIGUEL
FREY, MARLYS

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FRITH, MARYANN
FRITSCH, ERICH
FRITZLER, FRED
FROBER, LUCIE
FROKJAER, TOM
FROKJAR, KRYSIA
FUHRMANN, ANDREA
FUHRMANN, LARRY
FULLER, LOUISE
FULLER, MEL
FULLERTON, ANGELA
FULLERTON, CECLIA
FUNK, LINDA
FURNELL, WAYNE
FURSTEL, HELBERT (FOERSTEL)
FURSTEL, HELGA (FOERSTEL)
FYKE, RICHARD
GABLEHOUSE, LIZ
GAGHMAN, JERRY
GAJEWSKI, COLIN
GALLAGHER, RON
GALLAGHER, ROSS
GALLANT, JOHN
GALLO, CHARLES
GALLOWAY, IAN
GALPIN, JULIA
GALUSHA, JOHN
GAMBOA, FERNANDO
GAMBOA, TERRI
GANGGEL, RUDOLPH
GARCIA, CECILIA
GARCIA, JANICE
GARCIA, RICHARDO
GARCIA, ROBERTO
GARD, ANNIKA
GARNIER, CHARLES
GAROMME, JAROM
GARRAWAY, ROB
GARRIETY, PAUL
GARRITANO, SILVANA
GARRITY, CAROL
GATLING, AL
GAYNES, DENTON JR.
GAYNES, HARDY
GEARON, RICHARD THOMAS
GEE, JON
GELINAS, YVON
GENOVESE, ELIO
GENTRY, BRAD
GERBO, GAIL (BROWN)
GERBODE, SARGE
GERIS, JOHN
GERSTROM, OLE
GERVASONI, PIERANGELO
GHEZZI, CLAUDIO
GHIN, ANTONELLA
GHIONI, FABIO
GHIONI, LUIGI
GIACOSE, RICH
GIANLUCA, GIANLUCA
GIBSON, JAN
GIBSON, STEVE
GIL, PEDRO
GIL, SANDRA
GILBERT, BENNO
GILBERT, EMILE
GILBERT, JAN
GILBERT, PHILIP
GILES, KINGSLEY
GIL[illegible]AR, JOHN
GILL, DAVID
GILL, DYLAN
GILLETTE, KEVIN
GILLHAM, DOREEN SMITH
GILLHAM, PETER JR.
GILLIAM, JOHN
GINDEY, WAYNE
GIORDANO, LEDA
GIORDANO, SARA
GLASSFORD, JOHNATHAN
GLEASON, KERRY
GLENN, MIKE
GLUCK, ESTHER
GLUCK, EVELYN ANN
GODING, JIM
GODING, MARSHA ELLEN
GOLDBERG, JED
GOLDEN, MICHAEL
GOLDFIELD, EMILY
GOLDFIELD, STEVE
GOLDSTEIN, MIKE
GOLDSTEIN, REBECCA
GONNET, ROGER
GONZALES, GIOVANI
GONZALES, PABLO
GONZALEZ, GENARO
GONZALEZ, REBECCA DIAZ
GOODMAN, JILL
GOODMAN, RANDY
GOODRICH, ANN
GOODWIN, PETER
GORDON, LORI
GORDON, MILT
GORDON, MILTON
GORDON, PATRICK
GORDON, ROBERT
GOSBELL, PETER
GOTOH, AKIRA DR.

GRAHAM, DAVID GRIFFITH
GR[illegible] KATH
[illegible] MICHAEL
GRA[illegible], PAM
GRANADA, RENZO
GRANT, JIM
GRANT, JULIE
GRANT, PETER
GRANTHAM, DIANE
GRANTHAM, PATT
GRAY, LES
GREAVES, JUNE
GREEN, BERNIE
GREEN, PETER
GREEN, RICK
GREENE, BERNIE
GREENE, DORAN
GREENE, JEANIE
GREENE, PETER
GREENMANTLE, STEVE
GREGORY, CALVIN
GREIG, DAVID
GREIVE, GARY
GRIFFEN, GUS
GRIFFITHS, PETER
GRIMES, BRIAN
GRIMES, JULIE
GRISWOLD, EILEEN
GROENHUIZEN, FRITZ
GROSS, ERIC
GROSSET, OLIVER
GROSSMANN, HELENE
GROVERS, PETER
GUERIN, JOE
GUILBEAULT, BRIAN
GUILLEMIN, MARIE NOELLE
GUINWAN, TONY
GUSTA, DENISE
GUSTA, MATTHEW
~~GUY~~, ALISTAIR
GUY, BERNIE (DUBOIS)
GUY, COLIN
GUY, EWAN
GUY, JEAN-PAUL
HABER, BLAKE
HABER, DONNA
HABER, HARVEY
HABIB, PAT
HACHER, ALLEN
HACKER, FRED
HADFIELD, ANTHONY
HAGEN, MARIANNE
HAGNAZARIAN, VIKE
HAHN, KLAUS
HALD, TOMMY
HALFORD, ELENA
HALL, CINDY KAY
HALL, EVERET V.
HALL, KEVIN MICHAEL
HALL, STEPHEN
HALONEN, GARY
HAMAJI, MARY
HAMILTON, BILL
HAMILTON, MATT
HAMILTON, STARR HARVEY
HAMILTON, VIBEKE
HAMLIN, AVERY
HAMMILL, NEIL
HAMMONS, SHAWN
HANCOCK, DAVID
HANCOCK, KEVIN
HANEY, HEATHER
HANEY, RAY
HANLEY, BILL
HANLEY, CAROLINE
HANLEY, JOHN
HANSEN, ARDEN
HANSEN, DIANNA
HANSEN, KJELD KINZI
HANSON, JEANNIE
HANSON, NOEL
HANSSON, JEANNIE
HARDY, NICK
HARE, JAMES
HARIS, DON
HARKER, BILL
HARKER, LESLIE
HARMAN, RAY
HAROD, HERB
HARPER, LEN
HARRELL, BRUCE
HARRIS, ARNOLD
HARRIS, CAROL THOMAS
HARRIS, JONAH
HARRIS, TRAVERS
HARRISON, HUGH
HARRISON, MARK
HARRYMAN, MELISSA
HART, MAUREEN
HARVEY, CRAIG
HASLAM, SANDRA
HASLAM, STEVE (REED)
HASSELBERGER, CHANTALE
HASSELBERGER, SUSAN
HASTING, BILL
HAUG, RALF.
HAWLEY, KEN
HAWLEY, NANCY

HEDGECOCK, MIKE
HEEDE, FRITZ
HEID, MANFRF
HEIDERER, M.
HEINRICHMEYE[illegible]UDGER
HEINS, ELLA
HEISER, DAVID
HELFENBERGER, VIRGINIA
HENDERSON, NELSON
HENDERSON, SABRINA
HENDRICKS, CRAIG
HENNING, DAN
HENSON, ROGER
HENWOOD, DAVID ROSS
HENWOOD, ELAINE
HEPNER, NORM
HEREFORD, CHARLES
HERMANN, ARNOLD
HERMANN, SYLVIE
HERMANS, KARL
HERMANS, KATHY
HERNANDEZ, AGAPITO
HERNANDEZ, LESLIE
HERNANDEZ, MARIO JR.
HEYMANS, JOCIM
HIATT, WARREN
HIGGOTT, CAROL
HILL, BOB
HILL, ERIC SHAWN GILLIS
HILL, GRANT
HILL, JUDY
HILL, SALLY LOUISE
HILL, VAL
HILLARD, THEO
HILTON, RALPH
HILTON, RICK
HINDMARSH, GINNY
HIRSHERBERGER, TORSTEN
HITON, RICK
HOBEL, ARLYN
HOBEL, GENE GAIL
HOFER, MARTIN
HOFER, SUSI
HOFFMAN, MARGIE
HOGAN, IAN
HOGBERG, ULF
HOLLAND, GAIL
HOLLANDS, BRETT
HOLLELEY, PETER
HOLLIDAY, CARL
HOLLOWAY, DEBBIE BELL
HOLLOWAY, DON C.
HOLMES, DOUG
HOLMES, LINDA
HOLMSND, ALAN
HOLROW, PAUL
HOME, ULLI
HOMIER, BERNARD
HOOD, DOUGLAS
HOOKER, BOBBY
HOONG, ALAN CHOCK
HOPKINS, RON
HOPKINS, SUSAN
HORN, ERNST
HORNER, JACK
HORROCKS, KAREN
HORSTEDT, ROY
HORVATIC, TRACEY
HOTTOIS, PHILIPPE
HOTTOIS, TERESA
HOVERSON, SIG
HOWARD, STEVE
HOWARD, WALT
HOWE, BERNICE
HOXIE, BETH ANN
HUBBARD, GREG
HUBBARD, RICHARD
HUBER, FRANK
HUCKER, CHRISTINE
HUFFAM, BLAKE
HUGHES, DICK
HUGHES, KEN
HUGHES, RICHARD
HUNT, MARTIN
HUNT, PAGE
HUNTER, REX
HURST, NAN..
HURTADO, FRANK
HURWITZ, JAY
HURWITZ, PAM
HUSS, MILLIE
HUTCHERSON, MATT
HUTCHINS, WAYNE
HUTCHINSON, DAWN
HUTSON, MIKE
HUTTON, KIM (TAYLOR)
ILICH, ROBERT
IMBURGIA, PETER
IMPNEY, CYNTHIA
ISRAELSON, PRESTON
IZNAOLA, MARTIN
JACKSON, ADRIENNE
JACKSON, CHARLES
JACKSON, CLARISSE
JACKSON, KEVIN
JACKSON, TERRY ANN
JACKT, LAUREL
JACOB, RICHARD
JACOBI, MONIKA

JANSEN, LOTHAR
JANSSON, BERNT
JANSSON, CHRISTINE
JANSSON, JANINE
JARAMILLO, DUANE
JARON, TOM
JARRETT, SCOTT
JARVA, HARRIET
JASNOCK, DEREK
JASSO, ANNETTE KELLY
JEFFERSON, TOM
JELLISON, CECIL "DON"
JENKINS, ROD
JENKINSON, ARTHUR
JENNINGS, LESLIE
JENNINGS, MARGARET
JENSEN, LARRY
JENSON, DONNA
JENZEN, DOMINO R.
JEPSON, GARY
JERLING, CARA
JERLING, FRANCESCA
JERLING, MARA
JESSUP, AMOS
JESSUP, ARIEL
JESSUP, DALY
JESSUP, JAN
JIMENEZ, JOSE ANTONIO
JIMENEZ, ONDINA
JOHANSEN, JOHNNY
JOHANSEN, OJVIND
JOHANSSEN, ARNE
JOHANSSON, LESLIE
JOHNSON, JULIE
JOHNSON, LAMONT
JOHNSON, MARK
JOHNSON, MATTHEW
JONES, BOB
JONES, HARDY
JONES, JAMES 'ROLI'
JONES, MARK
JONES, RORY
JONSSON, BOO
JORDAN, DAVID
JORDAN, JULIE
JORY, DORANNE
JOYCE, TOM
JUELICH, BANDI
JUELICH, ED
KALAPUS, LARRY
KANDA, CAROL ANN
KAPLAN, STEVEN E.
KARAGIANNIS, DIMITRI
KARAS, DAVID
KATHARY, DALE
KATKE, TOM
KAWALLER, PAUL
KAY, ROB
KAYSER, JOE
KEAT, DAVID
KEAT, URSULA
KEATING, SANDRA KATHERINE
(VOSS)
KEAYS, ~~JEFF~~
KEELEN, DON
KEELER, DAVID
KEELER, DON
KELDERS, ANDRE
KELLY, BESS
KELLY, CHARLES
KELLY, DENNIS
KELLY, MIKE
KELLY, PATRICIA
KELLY, QUENTIN
KEMBER, JANE
KEMP, DAVID
KEMP, PAM
KEMP, RAY
KEMPFF, STEPHEN P.S.J.
KEON, GWEN
KERN, LORI
KERR, GUS
KERSHAW, DORIS
KERSHAW, JOHN
KESSLER, STEPHEN EDWARD
KETTERIDGE, GLYNN
KEYES; KEN
KHALIPA, MICHEL
KIEFER; DORTHE
KIEFER, MATHIAS
KIENE, IRMGARD
KIMMG, JIM
KIMNACH, DON
KING, CHRISTINA
KING, FRANCIS
KING, JOE
KINNES, LARRY
KINNINGER, RICHARD
KIRBY, SABRINA
KIRK, KEITH
KIRKLAND, DAVID
KIRN, HERBIE
KIRVES, JOUKO
KJOLSETH, FLORENCE
KJOLSETH, JOHN
KLEIN, GEORGE
KLENDA, CHRIS
KLIN, ARLENE
KLINGVALL, LIESE

ATTACHMENT

FRIAS, JOSE LUIS
FRIBERG, BENGT
FRIEDRICHSEN, SANDI
FRIEND, ROXANNE
FRIES, GALEN
FRIESE, PHIL
FRIETAS, MIGUEL
FRIGERI, DITORE
FRISK-WASSAETHER, CECILIA
FRITH, MARYANN
FRITSCH, ERICH
FRITZLER, FRED
FROBER, LUCIE
FROKJAER, TOM
FROKJAR, KRYSIA
FUHRMANN, ANDREA
FUHRMANN, LARRY
FULLER, LOUISE
FULLER, MEL
FULLERTON, ANGELA
FULLERTON, CECLIA
FUNK, LINDA
FURNELL, WAYNE
FURSTEL, HELBERT (FOERSTEL)
FURSTEL, HELGA (FOERSTEL)
FYKE, RICHARD
GABLEHOUSE, LIZ
GAUGHMAN, JERRY
GAJEWSKI, COLIN
GALLAGHER, RON
GALLAGHER, ROSS
GALLANT, JOHN
GALLO, CHARLES
GALLOWAY, IAN
GALPIN, JULIA
GALUSHA, JOHN
GAMBOA, FERNANDO
GAMBOA, TERRI
GANGGEL, RUDOLPH
GARCIA, CECILIA
GARCIA, JANICE
GARCIA, RICHARDO
GARCIA, ROBERTO
GARD, ANNIKA
GARNIER, CHARLES
GARONNE, JARON
GARRAWAY, ROB
GARRIETY, PAUL
GARRITANO, SILVANA
GARRITY, CAROL
GATLING, AL
GAYNES, BENTON JR.
GAYNES, HARDY
GEARON, RICHARD THOMAS
GEE, JON
GELINAS, YVON
GENOVESE, ELIO
GENTRY, BRAD
GERBO, GAIL (BROWN)
GERBODE, SARGE
GERIS, JOHN
GERSTROM, OLE
GERVASONI, PIERANGELO
GHEZZI, CLAUDIO
GHIN, ANTONELLA
GHIONI, FABIO
GHIONI, LUIGI
GIACOSE, RICH
GIANLUCA, GIANLUCA
GIBSON, JAN
GIBSON, STEVE
GIL, PEDRO
GIL, SANDRA
GILBERT, BENNO
GILBERT, EMILE
GILBERT, JAN
GILBERT, PHILIP
GILES, KINGSLEY
GILGAR, JOHN
GILL, DAVID
GILL, DYLAN
GILLETTE, KEVIN
GILLHAM, DOREEN SMITH
GILLHAM, PETER JR.
GILLIAM, JOHN
GINDEY, WAYNE
GIORDANO, LEDA
GIORDANO, SARA
GLASSFORD, JOHNATHAN
GLEASON, KERRY
GLENN, MIKE

GOTTFRIED, RANDY
GOTTLIEB, AUBREY
GOULD, YVONNE
GOULETTE, FABRICE
GRACE, MARILYN
GRADY, DALE
GRADY, JANICE
GRADY, PAUL
GRAESSLE, CRAIG
GRAHAM, DAVID GRIFFITH
GRAHAM, KATH
GRAHAM, MICHAEL
GRAHAM, PAM
GRANADA, RENZO
GRANT, JIM
GRANT, JULIE
GRANT, PETER
GRANTHAM, DIANE
GRANTHAM, PATT
GRAY, LES
GREAVES, JUNE
GREEN, BERNIE
GREEN, PETER
GREEN, RICK
GREENE, BERNIE
GREENE, DORAN
GREENE, JEANIE
GREENE, PETER
GREENMANTLE, STEVE
GREGORY, CALVIN
GREIG, DAVID
GREIVE, GARY
GRIFFEN, GUS
GRIFFITHS, PETER
GRIMES, BRIAN
GRIMES, JULIE
GRISWOLD, EILEEN
GROENHUIZEN, FRITZ
GROSS, ERIC
GROSSET, OLIVER
GROSSMANN, HELENE
GROVERS, PETER
GUERIN, JOE
GUILDEAULT, BRIAN
GUILLEMIN, MARIE NOELLE
GUINWAN, TONY
GUSTA, DENISE
GUSTA, MATTHEW
GUY, ALISTAIR
GUY, BERNIE (DUBOIS)
GUY, COLIN
GUY, EWAN
GUY, JEAN-PAUL
HABER, BLAKE
HABER, DONNA
HABER, HARVEY
HABIB, PAT
HACHER, ALLEN
HACKER, FRED
HADFIELD, ANTHONY
HAGEN, MARIANNE
HAGNAZARIAN, VIKE
HAHN, KLAUS
HALD, TOMMY
HALFORD, ELENA
HALL, CINDY KAY
HALL, EVERET V.
HALL, KEVIN MICHAEL
HALL, STEPHEN
HALONEN, GARY
HAMAJI, MARY
HAMILTON, BILL
HAMILTON, MATT
HAMILTON, STARR HARVEY
HAMILTON, VIBEKE
HAMLIN, AVERY
HAMMILL, NEIL
HAMMONS, SHAWN
HANCOCK, DAVID
HANCOCK, KEVIN
HANEY, HEATHER
HANEY, RAY
HANLEY, BILL
HANLEY, CAROLINE
HANLEY, JOHN
HANSEN, ARDEN
HANSEN, DIANNA
HANSEN, KJELD KINZI
HANSON, JEANNIE
HANSON, NOEL

HAY, GEORGE
HAYES, GREGORY EUGENE
HAZEL, INEZ
HAZELWOOD, GERRY
HAZELWOOD, TONI
HEARST, NANCY (BOWERS
KUGLER)
HECHE, ADAM
HEDGECOCK, MIKE
HEEDE, FRITZ
HEID, MANFRED
HEIDERER, MAX
HEINRICHMEYER, LUDGER
HEINS, ELLA
HEISER, DAVID
HELFENBERGER, VIRGINIA
HENDERSON, NELSON
HENDERSON, SABRINA
HENDRICKS, CRAIG
HENNING, DAN
HENSON, ROGER
HENWOOD, DAVID ROSS
HENWOOD, ELAINE
HEPNER, NORM
HEREFORD, CHARLES
HERMANN, ARNOLD
HERMANN, SYLVIE
HERMANS, KARL
HERMANS, KATHY
HERNANDEZ, AGAPITO
HERNANDEZ, LESLIE
HERNANDEZ, MARIO JR.
HEYMANS, JOCIM
HIATT, WARREN
HIGGOTT, CAROL
HILL, BOB
HILL, ERIC SHAWN GILLIS
HILL, GRANT
HILL, JUDY
HILL, SALLY LOUISE
HILL, VAL
HILLARD, THEO
HILTON, RALPH
HILTON, RICK
HINDMARSH, GINNY
HIRSHERBERGER, TORSTEN
HITON, RICK
HOBEL, ARLYN
HOBEL, GENE GAIL
HOFER, MARTIN
HOFER, SUSI
HOFFMAN, MARGIE
HOGAN, IAN
HOGBERG, ULF
HOLLAND, GAIL
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HOLLOWAY, DEBBIE BELL
HOLLOWAY, DON C.
HOLMES, DOUG
HOLMES, LINDA
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HOMIER, BERNARD
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HOOKER, BOBBY
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HOPKINS, SUSAN
HORN, ERNST
HORNER, JACK
HORROCKS, KAREN
HORSTEDT, ROY
HORVATIC, TRACEY
HOTTOIS, PHILIPPE
HOTTOIS, TERESA
HOVERSON, SIG
HOWARD, STEVE
HOWARD, WALT
HOWE, BERNICE
HOXIE, BETH ANN
HUBBARD, GREG
HUBBARD, RICHARD
HUBER, FRANK
HUCKER, CHRISTINE
HUFFAM, BLAKE
HUGHES, DICK
HUGHES, KEN

JACOBS, CAROL JUNE
JACOMIE, SAUNDRA
JACONELLO, GILES BENJAMIN
JACQUES, CATHERINE
JAMES, BOB
JAMES, LORI
JAMTHEDEN, ANNIKA
JAMTHEDEN, LARS
JANSEN, LOTHAR
JANSSON, BERNT
JANSSON, CHRISTINE
JANSSON, JANINE
JARAMILLO, DUANE
JARON, TOM
JARRETT, SCOTT
JARVA, HARRIET
JASNOCK, DEREK
JASSO, ANNETTE KELLY
JEFFERSON, TOM
JELLISON, CECIL "DON"
JENKINS, ROD
JENKINSON, ARTHUR
JENNINGS, LESLIE
JENNINGS, MARGARET
JENSEN, LARRY
JENSON, DONNA
JENZEN, DOMINO R.
JEPSON, GARY
JERLING, CARA
JERLING, FRANCESCA
JERLING, MARA
JESSUP, AMOS
JESSUP, ARIEL
JESSUP, DALY
JESSUP, JAN
JIMENEZ, JOSE ANTONIO
JIMENEZ, ONDINA
JOHANSEN, JOHNNY
JOHANSEN, OJVIND
JOHANSSEN, ARNE
JOHANSSON, LESLIE
JOHNSON, JULIE
JOHNSON, LAMONT
JOHNSON, MARK
JOHNSON, MATTHEW
JONES, BOB
JONES, HARDY
JONES, JAMES 'ROLI'
JONES, MARK
JONES, RORY
JONSSON, BOO
JORDAN, DAVID
JORDAN, JULIE
JORY, DORANNE
JOYCE, TOM
JUELICH, SANDI
JUELICH, ED
KALAPUS, LARRY
KANDA, CAROL ANN
KAPLAN, STEVEN E.
KARAGIANNIS, DIMITRI
KARAS, DAVID
KATHARY, DALE
KATKE, TOM
KAWALLER, PAUL
KAY, ROB
KAYSER, JOE
KEAT, DAVID
KEAT, URSULA
KEATING, SANDRA KATHERINE
(VOSS)
KEATS, ~~JEFF~~
KEELEN, DON
KEELER, DAVID
KEELER, DON
KELDERS, ANDRE
KELLY, BESS
KELLY, CHARLES
KELLY, DENNIS
KELLY, MIKE
KELLY, PATRICIA
KELLY, QUENTIN
KEMBER, JANE
KEMP, DAVID
KEMP, PAM
KEMP, RAY
KEMPFF, STEPHEN P.S.J.
KEON, GWEN
KERN, LORI
KERR, GUS

OSORIO, ELEAZAR
OSPITIA, HENRY
OSVATH, ANDY
OTTEN, PAULETTE
OWELLAN, PATRICK
OWEN, BILL
PADEL, JOHANNA
PACEY, DAN
PACITTI, GINO
PAGE, CHRISTIAN
PAGE, SUSAN
PAGE, VINCENT
PALMER, HARRY
PALMQUIST, HENRIK SVEN
PARADIS, DENIS
PARIZER, GALIT
PARKES, JAN
PARKHOUSE, HERBIE
PARKS, BILL
PARKS, JAN
PARLY, MIKE
PARSELLE, CHARLES
PASCAL, OLIVIER
PASCOLETTI, SILVIO
PASE, LAURIE
PASE, MARILYN
PASE, ROSIE
PASEWALK, ELISABETH
PATEL, MATHIAS (KROMMER)
PATHMAN, SUE
PATRICK, BRIAN ROBERT
PATRICK, CELIA
PATTERSON, BOBBY
PATTERSON, GRAHAM
PATTERSON, THEO
PATTINSON, PAUL
PAUL, BILL
PAUL, CLAUDIA
PAVESI, ARTURO
PAYNE, BILL
PEACHY, LIZ
PEARCE, GREG
PEARCE, RON
PEASE, GAIL
PEASE, HOWARD
PEDERSON, DONNA
PEDERSON, LARS
PEDROZA, JORGE TOMMASI
PEDRY, KAREN
PEDRY, WILLIAM
PEITERSON, LARS
PEITZ, JERRY
PELLEGRINI, MAURA
PELLEGRINO, TERESA
PELLERTON, BILL
PELLETIER, WILLIAM FRANCIS
PENDERGRASS, KATHY
PENNY, BOB
PENROSE, TERESA
PERCHINUNNO, ANTONIO
PERCZEK, RUBEN
PERELLI, ROSE
PERGUSON, NAT
PERKINS, JIM
PERLER, CHRISTA
PERLER, DANIEL
PERLMUTTER, GARY
PERRAS, PAUL
PERRI, CLAUDIO
PERRIN, STEVE
PETERSEN, INGE
PETERSEN, PAM
PETERSON, DICK
PETERSON, JANE
PETERSON, JUSTIN
PETERSON, RAINER
PETERSON, SVEN
PETIT-CADOLFI, JEAN-PIERRE
PFAFFERNOSCHKE, FRANK KLAUS
PFLUGER, CHRISTOPH
PFLUGER, CLAUDIA
PHILLIPS, RICHARD
PHILLIS, STEFAN
PICCINELLI, ALFREDO
PICHETTE, BRIAN
PICKSTOCK, KEITH
PIETRALUNGA, RAFFAELLA
PILO, BRUNO
PINDER, ANGIE
PITTARELLO, MAURIZIO
PIVO, LYNNE
PLADSBJERG, CLARA

PRADAT, THIERY
PRATHER, JOAN
PRATT, JUDY
PRATT, PALUCIA
PREECE, DEVAN
PRICE, FREDERICK WILLIAM
PRICE, MARVIN
PRIER, DEBBIE
PRIETRO, JORGE
PRIMROSE, CLAY
PRIOR, INES
PROM, DINI
PROSEN, TIM
PROVENZANO, TOM
PRUGSLEY, ALAN
PULLEN, OTIS
PUNTIROLI, CESARE
PUPILLO, MASSIMO
PUTTICK, DAVID
QUANDER, MICK
RACE, SYLVIA
RADEMUILLEE, INGRID
RAFANELLO, JOHN
RAGGI, DANIELLE
RAHN, GREG
RAINE, KATHY
RAMON, SASTRE
RAMSEY, DAVID
RANDALL, FREDDIE
RANDALL, LYNN
RANDALL, PAUL
RAMUS, ARACELI
RASPANTE, VINCENZO
RAUCCI, GIOVANNI
RAUDEN, LEW
RAINER, MICHAEL
RAY, DAVID
RAYMOND, CHRIS
RAYNER, STEPHEN
RAZZA, GRAZIELLA
REAVES, LARRY
REAVIS, JOHN
RECKERS, JIM JR
RECTOR, GINA
REDAELLI, FABIO
REECE, ROS ROYE
REED, FRED
REED, STEVE (HASLAM)
REIKE, SHERRY
REINER, LARRY
REINERTSON, ERIC
REINSTEDT, ERIC
REISCH, MAX
REISCH-FISCHER, MARIANNE
REISDORF, DEDE
REITZ, DAVID
REITZ, ELSE
REITZ, GABI
REITZ, LOTHAR
REITZ, PHAEDRA
REMAK, LILLIAN
REMITZ, BILL
RETI, SANDRA (DOMMEL)
REVELL, SUE
REX, MARCI
REZZONICO, ANDREA
REZZONICO, BOB
RICE, DUONE
RICH, JON
RICH, ROSAN
RICHARDSON, BRENDA
RICHARDSON, CHUCK
RICHARDSON, KEN
RICHARDSON, LARRY
RICHESON, BRUCE
RICHMAN, JOEL
RICKARD, HARRY
RIDDERSHOLM, CARSTEN
RIEKE, SHERI
RILEY, KARL
RINALDI, BORTOLO
RINALDI, PAOLO
RINGQUIST, BIRGITTA
RISSO, JOHN
RISVOLD, TERRY
RISVOLD, YVONNE
RIVERA, AWILDA
ROBERTSON, MARK
ROBERTSON, RENE
ROBITAILLE, YVES
ROBLES, HOLLY
ROBOTTOM, RICARDO

ROSE, DIANA
ROSE, KEN
ROSE, LEONARD
ROSENBERG, ANDREAS
ROSENBERG, LIZA
ROSENBLUM, ANNE
ROSS, RICK
ROSSEAUX-ARBOIS, JORGE
(LOKI)
ROSSETTI, JOHN
ROSSI, CINZIA
ROSSI, STEFANO
ROSSINI, TIZIANA
ROTH, DON
ROUMANET, MICHEL J.
ROUSSEL, DENIS
ROUSSET, PHILIPPE PIERRE
ROUTSONG, MARILYNN
ROWE, MARY
ROWER, HOWARD
ROWLEY, DON
ROWLEY, LLOYD
ROYLANCE, PAT STORMY
RUBIN, MICHAEL
RUBIN, MIKE
RUFFEL, DIANE
RUFFEL, MARK
RUGGERI, WALTER
RULE, DEBBIE
RUSH, LINDA
RUSSEL, JANET
RUSSELL, JANET
RUSSO, GIOVANNI
RUSTON, MARTIN
RYAN, B. P.
RYAN, BILL
RYAN, PRISCILLA
RYSTROM, DAVE
SAATHOFF, ROSEANN
SAECKER, TOM
SAHLWALL, STEFAN
SAHWANY, DIANA
SALA, SERENA
SALEN, TODDE
SALIN, DIDIER
SALINAS, MANNY
SALLEN, SYLVIE
SALONEN, PAULI
SAM, DAVID
SAMS, JAMIE
SAMSON, LAURENT
SAMUELS, GLENN
SAMUELS, LAUREN
SAMUELS, MARTIN
SAMUELS, MAUREEN
SANDERSON, HELEN
SANDERSON, ROB
SANDIN, ANN
SANDQUIST, SORAN
SANFILIPPO, ENZA
SARAFRAZ, BEHROOZ
SARFATI, NEIL
SARGEANT, FRANK
SARKANY, PAMELA
SASTRE, RAMON
SATTLER, BRIAN
SAUCHON, PHILLIPE
SAUERTEIG, MONI
SAUNDERS, ANDREW
SAUNDERS, RAY
SAWDY, ERIC
SAWYER, LEN
SCAGLIA, DOLORES
SCARRONE, VALERIO
SCHAEFER, NORM
SCHAFER, SIEGFRIED
SCHEDITZ, REINHARD
SCHELEIN, FAITH
SCHENK, HOLGER
SCHIRTSINGER, TENYA
SCHLEUE, JOE
SCHNEHAGE, JOAN
SCHNEIDER, DORTHEA
SCHNEIDER, RANDY
SCHNITZLER, NORBERT
SCHOBER, LISA MARIE
SCHWARTZ, ASHLEY
SCHWEITZER, JEANETTE
SCHWETTMAN, CATHERINE
SCIPPO, ENZO
SCOTT, DANA

SHINN, MARLENE (WEIGHT)
SHORTER, FRANCESCA
SHREWSBURY, CAROLE
SHREWSBURY, VAL
SHURLOCK, ELIZABETH
SIBERSKY, ALEX
SIBERSKY, MAGGIE
SIEGAL, LARRY
SIEGNEZ, DENIS
SILVIA, MARGARET MILLER
SIMMONS, JERRY
SIMMONS, NOLA
SIMONE, DEBBIE ROSEMARY
SIMONS, DON
SIMONS, GLEN
SIMPSON, KATHLEEN
SJOGREN, ROLF
SKINNER, BOB
SKINNER, SHAWN
SKINNES, JAMES
SKOGLOV, LILL-BRITT
SLOCUM, LESLIE
SLOCUM, SCOTT
SMALL, HEIDI
SMITH, ARVA
SMITH, BYRD
SMITH, CHARITY
SMITH, CHRIS
SMITH, CRAIG
SMITH, CYNTHIA
SMITH, DENISE
SMITH, GARY
SMITH, JACK
SMITH, JOSEPH A.
SMITH, MARGARET
SMITH, MIKE
SMITH, PENELOPE
SMITH, RICHARD
SMITH, RODNEY
SMITH, SANDY
SMITH, SYLVIA L.
SMITHERS, DENISE
SMITHERS, FRED
SMITHERS, GULIVER
SMOAK, GLENN
SNODGRASS, WAYNE
SODERBERG, KERSTIN
SOILES, CHRIS
SOMMERSTADT, REINHOLD
SORKIN, ROGER
SOROKA, ALEX
SOROKA, BEVERLY
SOUTH, RANDY
SPANGA, TOMASSO
SPARKS, EUGENE
SPEAR, JON
SPEAR, RICHARD T.
SPECIALE, TERESA
SPEER, BARBARA
SPEER, DENNIS
SPENCE, MERLE
SPENCE, MITCH
SPICER, TOD
SPICK, ANNETTE
SPIES, ANDRE
SPINA, CATERINA
ST GEORGE, AIMEE
ST PIERRE, CECILLE
STALNAKER, JAMES
STAMM, HUGO
STANAKER, JAMES
STANSFIELD, MANFRED
STANSFIELD, VALERIE
STARK, NORMA
STAROW, GREG
STECKLER, MICHAEL
STEELE, CILLA
STEGMEIER, DAVID
STEIN, MARY
STEINBERG, LEON
STEINER, CATHERINE
STEINER, DON
STEINER, LIZ
STEINERT, ELKE
STEINKE, DEBBIE
STEINS, ELLA
STEINS, KARIN
STENSGARD, JENS
STEPHENSON, JOYCE
STEGMAIER, DAVID NORMAN
STETTLER, WERNER

PAGE, CHRISTIAN
PAGE, SUSAN
PAGE, VINCENT
PALMER, HARRY
PALMQUIST, HENRIK SVEN
PARADIS, DENIS
PARIZER, GALIT
PARKES, JAN
PARKHOUSE, HERBIE
PARKS, BILL
PARKS, JAN
PARLY, MIKE
PARSELLE, CHARLES
PASCAL, OLIVIER
PASCOLETTI, SILVIO
PASE, LAURIE
PASE, MARILYN
PASE, ROSIE
PASEWALK, ELISABETH
PATEL, MATHIAS (KROMMER)
PATHMAN, SUE
PATRICK, BRIAN ROBERT
PATRICK, CELIA
PATTERSON, BOBBY
PATTERSON, GRAHAM
PATTERSON, THEO
PATTINSON, PAUL
PAUL, BILL
PAUL, CLAUDIA
PAVESI, ARTURO
PAYNE, BILL
PEACHY, LIZ
PEARCE, GREG
PEARCE, RON
PEASE, GAIL
PEASE, HOWARD
PEDERSON, DONNA
PEDERSON, LARS
PEDROZA, JORGE TOMMASI
PEDRY, KAREN
PEDRY, WILLIAM
PEITERSON, LARS
PEITZ, JERRY
PELLEGRINI, MAURA
PELLEGRINO, TERESA
PELLERTON, BILL
PELLETIER, WILLIAM FRANCIS
PENDERGRASS, KATHY
PENNY, BOB
PENROSE, TERESA
PERCHINUNNO, ANTONIO
PERCZEK, RUBEN
PERELLI, ROSE
PERGUSON, NAT
PERKINS, JIM
PERLER, CHRISTA
PERLER, DANIEL
PERLMUTTER, GARY
PERRAS, PAUL
PERRI, CLAUDIO
PERRIN, STEVE
PETERSEN, INGE
PETERSEN, PAM
PETERSON, DICK
PETERSON, JANE
PETERSON, JUSTIN
PETERSON, RAINER
PETERSON, SVEN
PETIT-CADOLFI, JEAN-PIERRE
PFAFFERNOSCHKE, FRANK KLAUS
PFLUGER, CHRISTOPH
PFLUGER, CLAUDIA
PHILLIPS, RICHARD
PHILLIS, STEFAN
PICCINELLI, ALFREDO
PICHETTE, BRIAN
PICKSTOCK, KEITH
PIETRALUNGA, RAFFAELLA
PILO, BRUNO
PINDER, ANGIE
PITTARELLO, MAURIZIO
PIVO, LYNNE
PLADSBJERG, CLARA
PLANCK, GEORGE D.
PLANKIS, BOB
PLANTEEN, ERIC
PLANTEEN, KATHY
PLATTNER, CINDY
PODOLL, MARTIN
POGETTO, ELISA
POINSIGNON, GILLES
POIRIER, YVAN
POISSANT, DIANE
POLIMENI, LINDA
POLIMENI, NICK
POLI[illegible]I, MICHAEL
POLWART, STEPHEN
POMEROY, SUE
POMPEI, LUIGINA
POORTENAAR, ELLY
POPE, GERRY
POPOVICH, MIRKO
PORIEN, LISE
POST, DAVID
POVALL, AMY
POVALL, DICK
POWELL, GORDON
POWELL, VICKI-LEIGH

PRIMROSE, CLAY
PRIOR, [illegible]S
[illegible]N, [illegible]
[illegible]SEN, [illegible]M
[illegible]OVENZANO, TOM
PRUGSLEY, ALAN
PULLEN, OTIS
PUNTIROLI, CESARE
PUPILLO, MASSIMO
PUTTICK, DAVID
QUANDER, MICK
RACE, SYLVIA
RADEMUILLEE, INGRID
RAFANELLO, JOHN
RAGGI, DANIELLE
RAHN, GREG
RAINE, KATHY
RAMON, SASTRE
RAMSEY, DAVID
RANDALL, FREDDIE
RANDALL, LYNN
RANDALL, PAUL
RANUS, ARACELI
RASPANTE, VINCENZO
RAUCCI, GIOVANNI
RAUDEN, LEW
RAXNER, MICHAEL
RAY, DAVID
RAYMOND, CHRIS
RAYNER, STEPHEN
RAZZA, GRAZIELLA
REAVES, LARRY
REAVIS, JOHN
RECKERS, JIM JR
RECTOR, GINA
REDAELLI, FABIO
REECE, ROS ROYE
REED, FRED
REED, STEVE (HASLAM)
REIKE, SHERRY
REINER, LARRY
REINERTSON, ERIC
REINSTEDT, ERIC
REISCH, MAX
REISCH-FISCHER, MARIANNE
REISDORF, DEDE
REITZ, DAVID
REITZ, ELSE
REITZ, GABI
REITZ, LOTHAR
REITZ, PHAEDRA
REMAK, LILLIAN
REMITZ, BILL
RETI, SANDRA (DOMMEL)
REVELL, SUE
REX, MARCI
REZZONICO, ANDREA
REZZONICO, BOB
RICE, DUONE
RICH, JON
RICH, ROSAN
RICHARDSON, BRENDA
RICHARDSON, CHUCK
RICHARDSON, KEN
RICHARDSON, LARRY
RICHESON, BRUCE
RICHMAN, JOEL
RICKARD, HARRY
RIDDERSHOLM, CARSTEN
RIEKE, SHERI
RILEY, KARL
RINALDI, BORTOLO
RINALDI, PAOLO
RINGQUIST, BIRGITTA
RISSO, JOHN
RISVOLD, TERRY
RISVOLD, YVONNE
RIVERA, AWILDA
ROBERTSON, MARK
ROBERTSON, RENE
ROBITAILLE, YVES
ROBLES, HOLLY
ROBOTTON, RICARDO
ROCHE, CARLA
ROCHE, GREG
ROCKHILL, MARY MATHES
RODERIC, DALE
RODINE, CYBELE
RODRIGUEZ, ENRIQUE-THOM
RODRIGUEZ, TOM
RODRIQUES, MANUEL
ROEST, LARS PETER
ROGEN, PETER
ROGERS, JAMES D.
ROGIES, AUGUSTUS
ROGIES, JAMES
ROHEN, DAN
ROHEN, GRISELDA
ROHL, DAVID LAWRENCE
ROLAND, FORESTHER
ROLSTAD, JAN
ROLSTAD, JUDY
ROMEN, SHAGHAR
RONEN, MIRA
RONQUIST, JON
ROOS, OTTO
ROOS, ROBIN (LAMBERTSON)
ROQUETA, EDWARD CAMILO

[illegible]
ROSSETTI, JOHN
ROSSI, CINZIA
ROSSI, STEFANO
ROSSINI, TIZIANA
ROTH, DON
ROUMANET, MICHEL J.
ROUSSEL, DENIS
ROUSSET, PHILIPPE PIERRE
ROUTSONG, MARILYNN
ROWE, MARY
ROWER, HOWARD
ROWLEY, DON
ROWLEY, LLOYD
ROYLANCE, PAT STORMY
RUBIN, MICHAEL
RUBIN, MIKE
RUFFEL, DIANE
RUFFEL, MARK
RUGGERI, WALTER
RULE, DEBBIE
RUSH, LINDA
RUSSEL, JANET
RUSSELL, JANET
RUSSO, GIOVANNI
RUSTON, MARTIN
RYAN, B. P.
RYAN, BILL
RYAN, PRISCILLA
RYSTROM, DAVE
SAATHOFF, ROSEANN
SAECKER, TOM
SAHLWALL, STEFAN
SAIWANY, DIANA
SALA, SERENA
SALEN, TODDE
SALIN, DIDIER
SALINAS, MANNY
SALLEN, SYLVIE
SALONEN, PAULI
SAM, DAVID
SAMS, JAMIE
SAMSON, LAURENT
SAMUELS, GLENN
SAMUELS, LAUREN
SAMUELS, MARTIN
SAMUELS, MAUREEN
SANDERSON, HELEN
SANDERSON, ROB
SANDIN, ANN
SANDQUIST, SORAN
SANFILIPPO, ENZA
SARAFRAZ, BEHROOZ
SARFATI, NEIL
SARGEANT, FRANK
SARKANY, PAMELA
SASTRE, RAMON
SATTLER, BRIAN
SAUCHON, PHILLIPE
SAUERTEIG, MONI
SAUNDERS, ANDREW
SAUNDERS, RAY
SAWDY, ERIC
SAWYER, LEN
SCAGLIA, DOLORES
SCARRONE, VALERIO
SCHAEFER, NORM
SCHAFER, SIEGFRIED
SCHEDITZ, REINHARD
SCHELEIN, FAITH
SCHENK, HOLGER
SCHIRTSINGER, TENYA
SCHLEUE, JOE
SCHNEHAGE, JOAN
SCHNEIDER, DORTHEA
SCHNEIDER, RANDY
SCHNITZLER, NORBERT
SCHOBER, LISA MARIE
SCHWARTZ, ASHLEY
SCHWEITZER, JEANETTE
SCHWETTMAN, CATHERINE
SCIBPO, ENZO
SCOTT, DANA
SCUPHAM, PETER
SEALMAN, WES
SEAMAN, NE
SEARING, RHONDA JEAN
SECCHI, FIAMMA
SECRIST, KYM
SEIDEL, ELISABETH
SEIDLER, THOMAS
SEIFLEIN, PHIL
SEIGAL, LARRY
SELP, LAURA
SELI ROLE, MARIA
SEMI C, DOROTHY
S FINI, MAURIZIO F. L.
S IS, CINDY
S KERSKY, VERA
S SMITH, JOHN
ARGETTA, PAOLO
HAND, PAUL
HANNON, MIKE
HAPIRO, EILEEN
HARK, NICK
HAW, KAREN
EA, MIKE
EA, MIRIAM
EA, RED

[illegible], DENIS
SILVIA, MARGARET MILLER
SIMMONS, JERRY
SIMMONS, NOLA
SIMONE, DEBBIE ROSEMARY
SIMONS, DON
SIMONS, GLEN
SIMPSON, KATHLEEN
SJOGREN, ROLF
SKINNER, BOB
SKINNER, SHAWN
SKINNES, JAMES
SKOGLOV, LILL-BRITT
SLOCUM, LESLIE
SLOCUM, SCOTT
SMALL, HEIDI
SMITH, ARVA
SMITH, BYRD
SMITH, CHARITY
SMITH, CHRIS
SMITH, CRAIG
SMITH, CYNTHIA
SMITH, DENISE
SMITH, GARY
SMITH, JACK
SMITH, JOSEPH A.
SMITH, MARGARET
SMITH, MIKE
SMITH, PENELOPE
SMITH, RICHARD
SMITH, RODNEY
SMITH, SANDY
SMITH, SYLVIA L.
SMITHERS, DENISE
SMITHERS, FRED
SMITHERS, GULIVER
SMOAK, GLENN
SNODGRASS, WAYNE
SODERBERG, KERSTIN
SOILES, CHRIS
SOMMERSTADT, REINHOLD
SORKIN, ROGER
SOROKA, ALEX
SOROKA, BEVERLY
SOUTH, RANDY
SPANGA, TOMASSO
SPARKS, EUGENE
SPEAR, JON
SPEAR, RICHARD T.
SPECIALE, TERESA
SPEER, BARBARA
SPEER, DENNIS
SPENCE, MERLE
SPENCE, MITCH
SPICER, TOD
SPICK, ANNETTE
SPIES, ANDRE
SPINA, CATERINA
ST GEORGE, AIMEE
ST PIERRE, CECILLE
STALNAKER, JAMES
STAMM, HUGO
STANAKER, JAMES
STANSFIELD, MANFRED
STANSFIELD, VALERIE
STARK, NORMA
STAROW, GREG
STECKLER, MICHAEL
STEELE, CILLA
STEGMEIER, DAVID
STEIN, MARY
STEINBERG, LEON
STEINER, CATHERINE
STEINER, DON
STEINER, LIZ
STEINERT, ELKE
STEINKE, DEBBIE
STEINS, ELLA
STEINS, KARIN
STENSGARD, JENS
STEPHENSON, JOYCE
STEGMAIER, DAVID NORMAN
STETTLER, WERNER
STEVENS, BRAD
STEVENS, JOHN
STEVENS, PAUL
STEVENSON, PETER MORLEY
STEVENSON, MICHELLE
STEVENSON, MIKE
STEVENSON, TAMARA
STEWART, ALAN
STEWART, MARYON
STEWART, RITA
STILL, JESSE
STOCKDALE, RICHARD
STOKES, DEAN
STOKES, MELANIE
STOLL, RICK
STONE, JEFF
STRAUBER, VON
STRAUSAARD, BIRGITTE
STRAUSS, RON
STRAWSER, BILL
STREET, MARTINA
STRICKLAND, RICK
STRINGER, DAVID
STROM, BENGT
STROM, NILS-OLOF
STROMFIELD, STANLEY

ATTACHMENT

STUCKEY, GRAHAM
STUMP, ROCKY
STURGIS, KATHERINE
SUBRAN, GILBERT
SULLIVAN, CARMEL
SULLIVAN, LAUR ULLI
SUNSHINE, LEO
SURIOL, JORDI
SVEDLUND, PER
SVENSSON, JONAS
SWANN, INGO
SWART, LEON
SWEETLAND, SUSAN
SWIFT, SUE
SWISKO, RENEE
SYKES, DARELL
SYMONDS, DEANE JOHN
SYNDER, BRIAN
TAAMS, ALLARD
TADEUSHK, PAT
TALBOT, DANIEL
TALENT, KATHY
TARBET, JIM
TATOMER, CHRIS
TAUGWALDER, ALOIS
TAYLOR, BRUCE
TAYLOR, DAVID
TAYLOR, GARY
TAYLOR, KIM (HUTTON)
TAYLOR, SCOTT
TAYLOR, SPANKY
TENNANT, DAVID
TENNBERG, LARS
TERRIS, RAY
TERZI, LUCA
THIELER, PHILIP
THOMAS, BOB
THOMAS, GREG
THOMAS, LARRY
THOMAS, MARK
THOMAS, RENE
THOMAS, TOM
THOME, ULLI
THOMPSON, CHRIS
THOMPSON, KARINA
THOMPSON, PATRICIA
TIMBERG, LARS
TIMPSON, RICHARD
TINNEY, MARY LOUISE
TITHUS, COLLETTE
TOAJARI, DONATA
TOCKER, BRAD
TOJARI, DONATA
TOLENTINO, ERROL JOHN
TOLOSI, VINCENT
TOLOSI, WENDY
TOMASIAN, RICH
TOMS, MARIA
TOMS, SIMON PHILIP
TONHAUSER, HEIDI
TONHAUSER, TONI
TOPE, BRIAN
TORAIN, EDNA
TORRENCE, MERCY
TORRES, ANGEL
TOWERY, BRIAN
TOWNSEND, JEFFREY
TRAUBERMAN, TOM
TRELLER, MARGARET
TREMBLAY, CHANTAL
TREMBLAY, HAROLD
TRUMP, HARRY
TREMITZ, KOOS HOLST
TRIGGS, SARA
TRUAX, JANE
TSCHUDIN, RES
TUCKER, RICHARD
TUGBOBO, ROSALINE
TURNER, GEORGE
TURNER, JAMES
TUROL, YUSHA
TUROWSK, KARL HEINZ
TUTELLIER, SARA
TYLER, CHRIS
ULANDER, HELEN
UNGER, WOLFGANG
URQUART, KEN
URSA, DAN
VAGGI, GIAN LUCA
VALENTINO, FRANCO
VALINTINE-SMITHE, MICHAEL

VIGIL, SHANNIN
VILJOEN, MARIO
VILJOEN, WENDY
VILLA, GIUSEPPINA
VILLADA, ALBERTO
VILLAGRAM, MOISES
VILLANUERA, PAOLO
VIN, VOS
VINCENT, DEBBIE
VINK, NOELINE
VIOLA, SONIA
VIRELLA, HILDA NIVIA
VIRGILE, ROBERT
VISK, BOB
VISK, LYNN
VISTI, SOREN
VITOLO, GIULIANA
VOEGEDING, DIANE
VOGEL, BEAT
VOGELBACH, CHRISTIAN
VOGELBACK, HOTTA
VOGT, PETER
VOISIN, MARYLENE
VOKEY, MARK
VON AMSTEL, ANN
VON BERGEN, VRENI
VON KAPFF, URLICH
VON LIEVEN, HANS
VOS, WIM
VOSPER, CYRIL
VOSS, RHONDA
VOSS, SANDRA KATHERINE
(KEATING)
WAITING, BRIAN
WALKER, GORDON
WALKER, JEFF
WALKER, JOHN
WALKER, MICHAEL
WALKER, NOEL
WALKER, PETER
WALKER, RUSSEL
WALKER, SYLVIA
WALLIN, LAURIE
WALSH, BRIAN
WALSH, CELIA
WALSH, KATHARINE
WALTER, ALAN
WALTER, EDDIE
WALTZ, DICK
WARDLAW, ERNIE
WARDLAW, GWEN
WARNOCK, DON
WARNOCK, SUSAN
WARTER, CARLOS
WASHINGTON, DAVE
WASSAETHER, HANS
WASSERMAN, KEN
WATHEN, GEORGE
WATSON, ERNA
WATSON, MARGARET
WATTS, STEVE
WAXLER, IAN
WAY, MARK
WEDDER, WENDY
WEIB, AL
WEICHT, MARLENE (SHINN)
WEIDEMAN, CHRIS
WEIR, KATHY
WEISNER, HANS
WELDON, CLARK
WELKER, BETTE
WELMINGER, TOM
WENDAL, JULIE
WENLOCK, MIK
WERNICKY, AIDA
WERSOCKI, EVA MARTA
WEST, FRAN
WEST, JAY
WEST, LARRY
WESTER, DAVID
WESTPHAL, ANNETTE
WESTPHAL, KJELL
WHEELOCK, THOMAS
WHITE, BOB
WHITE, DALLAS
WHITFIELD, HANNA
(ELTRINGHAM)
WHITFIELD, JERRY
WHITSON, BOB
WIEBE, AL
WIECHT, MARLENE (SHINN)

WIRZ, ANDRE
WITHE, GEOFF
WOLERY, ERIC
WOLF, SCOTT
WOLFE, RON
WOLFENSON, AMADA
WOLLERSHEIM, LARRY
WOOD, JOHN
WOODHOUSE, VIOLET
WOODRUFF, JOAN
WOODWORTH, CHRIS
WORREST, BOB
WORTH, DENNIS EUGENE
WRAY, HEATHER
WRAY, MIKE
WRIGHT, JIM
WRIGLEY, RICHARD
WSZELAKY, MYRON
WUNDERLICH, KEITH FRANCIS
WYAN, RANDALL
XANDER, PAUL
YACUK, ANASTASIA
YAMET, ROBERT
YARBOROUGH, DOUG
YARID, KEITH
YARROW, ANDY
YATES, ANGELA
YOUNG, BILL
YOUNG, BOB
YOUNG, HOLLY
YOUNG, LOY
YRJONEN, VIRPI JOHANNA
ZACCONI, CRISTINA
ZACHAROPOULOS, TOKIKO
ZAICHKOVSKI, ROBIN
ZAMBO, GREG
ZAMIT, NORMA
ZANA, LISA
ZANARDELLI, GIUSEPPE
ZANARDI, CARLO
ZANELLA, CLAUDIO
ZANETTI, MARCO
ZANNONI, ELVIO
ZAPUTIL, ANGELA
ZDENICK, SINANDL
ZEER, TERRY
ZEGEL, JON
ZEGEL, VIVIAN
ZEIGLER, AMY
ZENOU, JOEY
ZILE, ANT

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SWEETLAND, SUSAN
SWIFT, SUE
SWISKO, RENEE
SYKES, DARELL
SYMONDS, DEANE JOHN
SYNDER, BRIAN
TAAMS, ALLARD
TADEUSHK, PAT
TALBOT, DANIEL
TALENT, KATHY
ARBET, JIM
ATOMER, CHRIS
TAUGWALDER, ALOIS
TAYLOR, BRUCE
TAYLOR, DAVID
TAYLOR, GARY
TAYLOR, KIM (HUTTON)
TAYLOR, SCOTT
TAYLOR, SPANKY
TENNANT, DAVID
TENNBERG, LARS
TERRIS, RAY
TERZI, LUCA
THIELER, PHILIP
THOMAS, BOB
THOMAS, GREG
THOMAS, LARRY
THOMAS, MARK
THOMAS, RENE
THOMAS, TOM
THOME, ULLI
THOMPSON, CHRIS
THOMPSON, KARINA
THOMPSON, PATRICIA
TIMBERG, LARS
TIMPSON, RICHARD
TINNEY, MARY LOUISE
TITHUS, COLLETTE
TOAJARI, DONATA
TOCKER, BRAD
TOJARI, DONATA
TOLENTINO, ERROL JOHN
TOLOSI, VINCENT
TOLOSI, WENDY
TOMASIAN, RICH
TOMS, MARIA
TOMS, SIMON PHILIP
TONHAUSER, HEIDI
TONHAUSER, TONI
TOPE, BRIAN
TORAIN, EDNA
TORRENCE, MERCY
TORRES, ANGEL
TOWERY, BRIAN
TOWNSEND, JEFFREY
TRAUBERMAN, TOM
TRELLER, MARGARET
TREMBLAY, CHANTAL
TREMBLAY, HAROLD
TRUMP, HARRY
TRENITE, KOOS HOLST
TRIGGS, SARA
TRUAX, JANE
TSCHUDIN, RES
TUCKER, RICHARD
TUGBODO, ROSALINE
TURNER, GEORGE
TURNER, JAMES
TUROL, YUSKA
TUROWSK, KARL HEINZ
TUTELLIER, SARA
TYLER, CHRIS
ULANDER, HELEN
UNGER, WOLFGANG
UNQUART, KEN
URSA, DAN
VAGGI, GIAN LUCA
VALENTINO, FRANCO
VALINTINE-SMITHE, MICHAEL
VALLIERS, INGRID
VAMPI, MASSIMO
VAN DEURSFORMAN, JAN
VAN DOORN, JUDITH
VAN DOORN, PETER
VAN GEMEN, HANS
VAN HARASZ, VICTORIA
VAN HOOMISEN, STEVE
VAN HOOMISON, MICHELLE
VAN STADEN, JOE
VANASSE, DENNIS
VANCE, CLARK
VANDENBURG, MARILYN
VARIDAY, BRIAN
VARIUR, BILL
VAVRUS, MARK
VAVRUS, SHERRY
VEIN, ENID
VELKE; JOAN
VELKE, TOM
VERDEJO, CARMEN
VERKERK, ALBERT
VERMAN, BARRY
VERSACE, SAL
VICTOR, LEONARD
VIEN, ENID

VIRGILE, ROBERT
VISK, BO [illegible]
V [illegible] LY [illegible]
V [illegible] S [illegible]
V [illegible] O, GIULIANA
VOEGEDING, DIANE
VOGEL, BEAT
VOGELBACH, CHRISTIAN
VOGELBACK, HOTTA
VOGT, PETER
VOISIN, MARYLENE
VOKEY, MARK
VON AMSTEL, ANN
VON BERGEN, VRENI
VON KAPFF, URLICH
VON LIEVEN, HANS
VOS, WIM
VOSPER, CYRIL
VOSS, RHONDA
VOSS, SANDRA KATHERINE
(KEATING)
WAITING, BRIAN
WALKER, GORDON
WALKER, JEFF
WALKER, JOHN
WALKER, MICHAEL
WALKER, NOEL
WALKER, PETER
WALKER, RUSSEL
WALKER, SYLVIA
WALLIN, LAURIE
WALSH, BRIAN
WALSH, CELIA
WALSH, KATHARINE
WALTER, ALAN
WALTER, EDDIE
WALTZ, DICK
WARDLAW, ERNIE
WARDLAW, GWEN
WARNOCK, DON
WARNOCK, SUSAN
WARTER, CARLOS
WASHINGTON, DAVE
WASSAETHER, HANS
WASSERMAN, KEN
WATHEN, GEORGE
WATSON, ERNA
WATSON, MARGARET
WATTS, STEVE
WAXLER, IAN
WAY, MARK
WEDNER, WENDY
WEID, AL
WEICHT, MARLENE (SHINN)
WEIDEMAN, CHRIS
WEIR, KATHY
WEISNER, HANS
WELDON, CLARK
WELKER, BETTE
WELMINGER, TOM
WENDAL, JULIE
WENLOCK, MIK
WERNICKY, AIDA
WERSOCKI, EVA MARTA
WEST, FRAN
WEST, JAY
WEST, LARRY
WESTER, DAVID
WESTPHAL, ANNETTE
WESTPHAL, KJELL
WHEELOCK, THOMAS
WHITE, BOB
WHITE, DALLAS
WHITFIELD, HANNA
(ELTRINGHAM)
WHITFIELD, JERRY
WHITSON, BOB
WIEBE, AL
WIECHT, MARLENE (SHINN)
WIKE, VICTORIA
WILBERFORCE, LAWRENCE
WILBUR, GEORGE
WILBUR, LARRY
WILDBANK, CHARLES
WILFERT, JIM
WILFERT, JUDY
WILHITE, CHET
WILKINS, KEVIN
WILKINSON, HOWARD
WILKINSON, JULIE
WILKINSON, STACY
WILLIAMS, DEE
WILLIAMS, DICK
WILLIAMS, MIKE
WILLIAMS, MURIELEY
WILLIAMS, PETER
WILLIAMS, ROBERT III
WILSON, AUDREY
WILSON, DAVID
WILSON, IAN
WIMBUSH, BERNIE
WIMBUSH, BEVERLEY
WIMBUSH, CORALIE
WIMBUSH, EILEEN
WIMBUSH, KINGSLEY

WORTH, DENNIS EUGENE
WRAY, HEATHER
WRAY, MIKE
WRIGHT, JIM
WRIGLEY, RICHARD
WSZELAKY, MYRON
WUNDERLICH, KEITH FRANCIS
WYAN, RANDALL
XANDER, PAUL
YACUK, ANASTASHA
YAMET, ROBERT
YARBOROUGH, DOUG
YARID, KEITH
YARROW, ANDY
YATES, ANGELA
YOUNG, BILL
YOUNG, BOB
YOUNG, HOLLY
YOUNG, LOY
YRJONEN, VIRPI JOHANNA
ZACCONI, CRISTINA
ZACHAROPOULOS, TOKIKO
ZAICHKOVSKI, ROBIN
ZAMBO, GREG
ZAMIT, NORMA
ZANA, LISA
ZANARDELLI, GIUSEPPE
ZANARDI, CARLO
ZANELLA, CLAUDIO
ZANETTI, MARCO
ZANNONI, ELVIO
ZAPUTIL, ANGELA
ZDENICK, SIMANDL
ZEER, TERRY
ZEGEL, JON
ZEGEL, VIVIAN
ZEIGLER, AMY
ZENOU, JOEY
ZILE, AMY

EXECUTIVE DIRECTIVE

7372

OSA INT ED 19
ALL SCIENTOLOGISTS
PUBLIC NOTICE BOARD
STAFF NOTICE BOARD

10 September 1984

SQUIRRELS

The following people have demonstrated that they cannot be trusted with the religion of Scientology or Scientologists. Their actions are destructive and aimed at the enslavement rather than the freedom of man.

Dede Voegeding
Kima Douglas
Gerry Armstrong
John Nelson
Laurel Sullivan
David Mayo

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The above named squirrels have attempted to taint government with their false reports.

They have deliberately held policy up to scorn and altered such policies to suit their own destructive end.

Some of these squirrels have offered false testimony to the IRS in order to protect their overts against mankind and their only road out of this universe.

Several of them have misrepresented Scientology practices to the FBI or Justice Department in a futile attempt to taint the minds of the government and the courts against the Church of Scientology.

They have supported psychiatric aims and principles over Scientology principles in their misrepresentations to Department of Justice representatives as well as Boston lawyer Michael Flynn.

They have turned from ethical and moral Scientology principles by demanding no ethics be applied to them or by them.

Several of them have spoken out against Scientologists in good standing to the IRS in a hope that they might escape from their own destructive acts and shift attention from themselves and their crimes.

They have altered and assisted in the alteration of Tech in an attempt to seal off the bridge to those who have fallen prey to their destructive intentions.

They have altered and assisted in the alteration of Tech in an attempt to seal off the bridge to those who have fallen prey to their destructive intentions.

Their continued harmful acts to themselves and their continued desire to drag others to the level of beasts and animals devoid of spiritual qualities places them in the psychiatric camp of those who manufacture madness for profit.

Therefore, be it known that these acts of spiritual destruction and cries for no ethics, no morals, and no policy, have separated them from the body of the ethical and practicing Scientologists of this planet.

Dedicated Scientologists need not support them until they
e fully recanted and fully fulfilled all of the
uirements of the Ethics and Justice P.L. dealing with
pressives and suppressive acts.

This ED is written that those who are not informed as to
acts of those named above may now be so informed.

It is written so that those who are not Scientologists
be warned that these individuals do not represent the
urch or the religion of Scientology in any capacity.

Their only terminal is the International Justice Chief.

CO OSA INT

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AVC INT

for the
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

emimeo

HCO POLICY LETTER OF 18 OCTOBER 1967
Issue IV

PENALTIES FOR LOWER CONDITIONS
(Applies both Orgs and Sea Org)

IABILITY - Suspension of Pay and a dirty grey rag on left arm and day and night confinement to org premises.

REASON - Suspension of pay and deprivation of all uniforms and insignia, a black mark on left cheek and confinement on org premises or dismissal from post and debarment from premises.

OUBT - Debarment from premises. Not to be employed. Payment of fine amountin to any sum may have cost org. Not to be trained or processed. Not to be communicated or argued with.

NEMY - SP Order. Fair game. May be deprived of property or injured by any means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed.

RH:jp

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Founder

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HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

HCO POLICY LETTER OF 21 OCTOBER 1968

Remimeo

CANCELLATION OF FAIR GAME

The practice of declaring people FAIR GAME will cease. FAIR GAME may not appear on any Ethics Order. It causes bad public relations.

This P/L does not cancel any policy on the treatment or handling of an SP.

L. RON HUBBARD
Founder

LRH:ei.cden

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HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

HCO POLICY LETTER OF 21 NOVEMBER 1972
Issue I

Remimeo
All PR Packs

PR Series 18

HOW TO HANDLE BLACK PROPAGANDA

RUMORS AND WHISPERING CAMPAIGNS

"Black propaganda" (Black = bad or derogatory, propaganda = pushing out statements or ideas) is the term used to destroy reputation or public belief in persons, companies or nations.

It is a common tool of agencies who are seeking to destroy real or fancied enemies or seek dominance in some field.

The technique seeks to bring a reputation so low that the person, company or nation is denied any rights whatever by "general agreement". It is then possible to destroy the person, company or nation with a minor attack if the Black Propaganda itself has not already accomplished this.

Vicious and lying gossip by old women was the earlier form of this tactic and was so bad that some areas put them in public stocks (neck yokes) or drove them out of town.

In modern times there is no such check on Black Propaganda. Difficulties and costs of libel and slander suits, abuse of press privilege, lay anyone open to such a campaign.

All one needs is an enemy. And there are few men in history who have been without enemies.

There are random individuals in the society who do not understand very much. This is expressed as a sort of malicious glee about things. Such pass on slanderous rumors very easily. In an illiterate society such people abound. Since they cannot read, the bulk of knowledge is denied to them. Since they do not know very many words much of what is said to them is not understood.

This is not isolated to the illiterate only.

What they do not understand they substitute for with imaginary things.

Thus such persons not only listen to slander but also corrupt and twist even it.

Thus a rumor can go through a society that has no basis in truth.

When numbers of such rumors exist and are persistent, one suspects a "Whispering Campaign". This is not because people whisper these things but because like an evil wind it *seems* to have no source.

Black Propaganda makes use of such a willingness to pass on and amplify falsehoods.

Much Black Propaganda is of course more bold and appears blatantly in irresponsible (or covertly controlled) newspapers and radio and television.

But even after a bad press story has appeared or a bad radio or TV broadcast has been given, the "Whispering Campaign" is counted upon by Black Propagandists to carry the slander through the society.

Thus any person, any being, is at risk.

No person, company or nation has totally clean hands. That is left to the Saints. In childhood one stole a few apples, broke a window or two, dented a fender, went joy riding in a "borrowed" vehicle or took pennies or candy bars that weren't his own.

Childhood is quite lawless and the teenage period is often a revolt against the

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closer and closer fitting straightjacket of "proper social conduct". One marries the wrong spouse or goes astray with another in some incautious moment, or commits various large and small sins of which society disapproves.

Any of these things tend to make one vulnerable to attack, upon his past or repute.

A person comes to fear bad things being said about him. In the face of a Whispering Campaign, real or imagined, one tends to withdraw, tends to become less active and reach less.

This is equally true of companies and even nations.

Thus, unless one knows how to handle such an attack, one can in fact be made quite miserable and ill.

THE ATTACKER

The world is full of madmen.

The basic characteristic of extreme madness is perpetual attack, attacks on anything, attacks on persons or things which contain no menace.

Extreme, not petty, crime is at the root of such an impulse.

The attacker has an evil purpose in life. He is a thing of death, not life. And his harvest is a death harvest.

Such a person feels he cannot be safe unless everything else is dead.

His evil purpose takes many forms and expressions. The end product is the same—death.

Where an attacker has gone too far he is himself then attacked. Long bitter quarrels and national wars are alike the to and fro exchange of violence.

Where an attacker lacks the physical means of destroying others and where his own purpose would fail if disclosed, the attacks become covert.

He uses word of mouth, press media, any communication channel to spit his venom. He hides himself as the source, he makes the verbal attack seem logical or real or proven.

He counts on the utterances being picked up or distorted and passed on by the more base people in the society.

This is Black Propaganda. It is intended to reduce a real or imagined enemy, hurt his income and deny him friends and support.

Companies or associations do this to competitors. The American Medical Association maintains its multi-billion dollar monopoly over sickness by continuing a long, well financed Black Propaganda campaign against anyone it *thinks* might threaten their income. The head of their "Department of Investigation" (as they call their Black Propaganda department) once said they just kept it up and kept it up against any rival and one day WHAM! They use press releases, their own members, paid ads, displays, government connections and speakers, any channel, to release endless streams of *imaginary* tales against any *imaginary* rival. While this does bring them government support it has brought them deep hatred not only from rivals but the public at large.

They get back what they put out. They were once wealthy. They are no longer. Their members dislike them and increasingly doctors belong only to state medical societies, not the AMA. The individual doctor most often has good public relations. His main society benefits from this and betrays it. One day, no AMA. WHAM!

So Black Propaganda is not something one lightly instigates. For it recoils on the person who uses it.

Let us see how it recoils.

Too much venom put out stains one with venom.

Too much Black Propaganda gets attacks in return.

Black Propaganda is essentially a fabric of lies. The AMA simply imagines stories to put out or have put out.

Sooner or later such stories are found not to be true. ONE false story can destroy the credit of the teller. Now who listens?

Thus a Black Propaganda Campaign is vulnerable. The attacker sooner or later is attacked—often by many.

But those who have to counter such a campaign need the technology of how it is handled.

ANY NEWS

There is a natural law at work that unfortunately favors Black Propaganda.

WHERE THERE IS NO DATA AVAILABLE PEOPLE WILL INVENT IT.

This is the Law of the Omitted Data.

A vacuum tends to fill itself. Old philosophers said that "nature abhors a vacuum". Actually the surrounding pressure flows into an area of no pressure.

It is this way with a person, company or nation.

Hit by lies the person tends to withdraw. This already tends to pull things in.

The person does not then wish to put out data. He becomes to some degree a mystery.

To fill that mystery people will invent data.

This is true of persons, companies or nations.

This is where *public relations is a necessity*

Essentially Public Relations is the art of making good works well known.

It is a fatal error to think good works speak for themselves. They do not. They must be publicized.

Essentially this is what public relations is. And this is *why* it is—to fill that vacuum of omitted data.

In the midst of a Black Propaganda Campaign one is denied normal communication channels. The press media along which the campaign is being conducted will *not* run favorable comment. One is mad if he thinks it will as it is serving other masters that mean to destroy the repute of the Target.

"Authoritative" utterances push plain truth out of sight.

Thus public relations people have to be very expert in their technology when they confront Black Propaganda.

THE TECH

When one is not fighting a battle against Black Propaganda, public relations is easy.

One hires a reporter who gets to work thinking up ideas and turning out releases. That's why reporters are often thought of as Public Relations people which they are not.

In the face of a Black Propaganda Campaign, such releases are twisted, refused and that is the end of it.

There is far more to the art than this.

These are some of the rules that apply.

1. Fill the vacuum of omitted data with factual data.
2. Prove all false utterances heard are lies.
3. Discredit every rumor encountered.
4. Handle the interest level with any utterance.
5. Carefully study out the scene until the exact source is located.

6. Use the knowledge of source to impede or destroy the source of Black Propaganda by non-criminal means.

7. Continue to fill the vacuum of no data with good data using any channels available.

Each one of these points could well take a book. But understanding them and using one's initiative one can fill in a lot of the tech himself.

The variations of each one are endless.

APPLICATION

1. Fill the Vacuum.

First of all, cease to withdraw. It is proven conclusively that in public relations handling of Black Propaganda, only outflow pays off. Saying nothing may be noble in a character but it is fatal in public relations. Yet even "experts" advise it (when they are doing their clients in).

Blunt denial is crude and can be used against one as a sort of confirmation.

You don't have to announce or spread a flap and never should. PR men often *make* the flap.

But don't interpret this as "silence is necessary". Get in a safe place and speak up.

Use any channel to speak up. But don't seek channels that will corrupt what you say in repeating it.

Don't stay on the same subject that you are being attacked on.

An example of speaking up without denying and thus confirming might be:

STATEMENT: "I read your company went broke last month."

REBUTTAL: "My God. You're telling me! If we hadn't got out of that contract we really would have gone broke. There was a hell of a row in the board room. But McLinty won. Scotch to the core. He said, 'I won't sign it!' Like to have tore the president's head off. Hell of a row. Seems like we got 80 million buried somewhere and McLinty is in charge of it and he won't *move an inch* on it."

The Interrogator's conclusion is you're not broke. He's got data. The vacuum is filled with a story of board rows and 80 million mysterious reserves.

2. Disprove False Data.

The technique of proving utterances false is called "DEAD AGENTING". It's in the first book of Chinese espionage. When the enemy agent gives false data, those who believed him but now find it false kill him—or at least cease to believe him.

So the PR slang for it is "Dead Agenting".

This consists of disproving utterly the false statement with documents or demonstration or display.

One has to have a kit (a collection of documents) or the ability to demonstrate or something to display.

STATEMENT: "I've been told you are in trouble with Income Tax people."

REBUTTAL: "Here's a document of fully paid taxes and a letter of commendation from the tax authorities." Displays some.

Result? Whoever told him that is now dead with him as an accurate informer.

The *best* way to dead agent is when the person makes some disprovable statement, find WHO to fix his mind on it and then produce the rebuttal.

STATEMENT: "I hear you aren't married to the man you're living with."

REBUTTAL: "*WHO* told you that?"

STATER: "I forget."

REBUTTER: "Well you remember and I'll show you some proof."

STATER: "Well, it was a man. . . ."

REBUTTER: "WHO?"

STATER: "Joe Schmo."

REBUTTER: "Okay. Here's my marriage certificate. Who's the Joe Schmo nut anyway?"

Now it's Joe Schmo who's the mystery. How come he lies? What's in it for him?

When one hasn't got the document but can get it one can say, "You tell me the name of whoever said that and next time I see you I'll show you something *very* interesting about it."

And be sure to get the document and see him again.

Dead Agenting has a billion variations. "It won't fly." Fly it. "Place is empty." Show him it's full.

The subject matter of Dead Agenting is PROOF in whatever form.

You only challenge statements you *can* prove are false and in any conversation let the rest slide.

EVERY FRIEND, EVERY OPINION LEADER, EVERY STAFF MEMBER YOU HAVE SHOULD BE SUPPLIED WITH A DEAD AGENT PACK CONTAINING PROOFS AGAINST COMMON RUMORS (AND BROCHURES AND COACHING TO FILL THE VACUUM).

3. Disprove Every Rumor.

Proving negatives is almost impossible. "How do I know you aren't a CIA man?" Well, how can one prove that? One can't whip out a KGB badge as that would be just as bad. No one ever wrote a document "Bill Till is not a member of the CIA." Useless. It is a denial. Who'd believe it?

Sometimes "You don't" works.

But the right answer to a negative (no proof) is a "fill the vacuum".

STATEMENT: "How do I know you're not a CIA man?"

REBUTTAL: "Christ, please don't insult me! The CIA tried to hire me once. Said they'd shoot me if I didn't join up. Cuba it was. I was a sugar salesman. And Batista was trying to. . . . . etc. etc. See this scar on my leg? (Pulls up pants.) Batista cop shot me because he thought I was CIA. So don't bring up painful subjects. (Rubs scar.) (Laugh.)"

But once in a while you *can* prove a negative. Accused of drug smuggling one can show he's a member of the anti-drug league. The counter in a negative proof must be *creditable*.

A million million variations exist in Dead Agenting.

The basis of it is NOT to be the thing rumored and to be able to prove it fast.

4. Handle the Level.

Handling Interest Level is basically an exercise in the Tone Scale. (See Tone Scale Charts of Human Emotion.)

Agreement occurs at the same emotional tone level as the person making the statement. He buys his facts at that level.

To go half a tone up from his level is to command him within his zone of reality.

STATEMENT: "It's hopeless trying to believe in anyone. I thought you people were all right but now I hear you are all hippies. (In a dull apathy.)"

REBUTTAL: "Oh, oh, oh, who could have told you such a sad lie. (Sob.)"

STATER: "Wouldn't be any use to say."

REBUTTER: "(Sob.) But you've got to say. Oh, I feel so awful."

STATER: "Well he wouldn't care if I told. It's the local minister."

REBUTTER: "(Sob.) (Kleenex.) What an awful thing to say. Just because we found him dead drunk and took him home to sleep it off and he said if we ever told he'd say we're hippies."

STATER: "What a sad story. Oh, it's a bad world. How ungrateful."

You go half a tone up. Give him a story, on the subject or not. Like "(Sob) That's because we lost our instruments. We once were a band and this nightclub owner wouldn't pay us and we had to sleep in the barn (sob). . . ."

Another one.

STATEMENT: "I hear some bad things about you people. (Covert hostility.)"

REBUTTAL: "(Anger) Who would DARE say such things?"

Etc.

And story type can be matched in tone.

STATEMENT: "I hear those people stole some rowboats."

REBUTTAL: "Who said so?"

STATER: "The dock master's son."

REBUTTAL: "Oh, him. Gets things wrong. *Our* rowboat was stolen! With all the gear in it. We were out fishing and. . . . . say, you don't suppose HE stole it do you? Did you ever hear of him stealing anything? Has he got a record?"

Well, this dock master's son will now "have a record" in the stater's tales. As *theft* is of interest to him, crime will also be.

5. Carefully Study Out the Scene.

The technology of finding who is shooting is very vast. But the core of it is FILING.

All PR is expensive in time or money or both. And nowhere is it more time consuming than in locating the source of a Black Propaganda Campaign.

But, to live at all, one has to engage in this search at some time or other.

One just keeps running down these tales until one locates the source.

There can be more than one *apparent* source and these can be handled. But they will at last lead to the real instigator.

One just keeps locating names and filing them, with dates.

At length one name file is very thick. That's your boy—or association or company or nation.

6. Impede or Destroy.

As you have been dead agenting as you looked, the attacks get handled. The campaign ebbs and flows but actually lessens.

There are thousands of variations on finding the real WHO.

But essentially it is just looking, dead agenting, filing, looking on and on.

You are, in this whole period, *handling*

Once in a while it happens fast.

Now and then the Black Propagandist packs up and fades away before he is fully spotted. He becomes aware of the counter-action.

The usual action is a counter propaganda campaign *based on truth*.

It is a long-to-find and hard-learned fact that people who engage in Black Propaganda have big bursting crimes to hide.

They do not have *little* crimes. They have BIG ones.

One's own ability to confront evil may be too low to really grasp the Black Propagandist's crimes or believe they exist.

Such people are often SANCTIMONIOUS hypocrites. They are usually arrogant and will not parley (have conferences with a foe). They appear so terribly sure they are RIGHT that it fairly shakes one's confidence that they could ever do anything wrong.

Thus the Black Propagandist is not detectable as such in many cases. The lordly institution, the lofty society, the glittering country are far, far above such a nasty psychotic trick as a studied, financed, expertly run campaign of vicious lies.

Thus they are believed. Or their servants are believed. And their campaigns can be *very* effective.

But this makes them hard to suspect or detect. And it makes it hard to get anything bad about *them* believed.

But under all this are *real* crimes. Not stealing apples or pinching pennies as a child. *Real* crimes like extortion, blackmail, embezzlement and mass murder are sitting in their closets. Believe that. For in the course of your counter-attack you may despair of ever finding anything.

But you will find it.

A lofty railroad—but secretly murdering anyone who opposed their land grabs. A minister of high renown—but a secret member of and taking orders from a murder mob. The biggest and "most respected" union leader in the country—but a numbered agent of a foreign intelligence service dedicated to destroying the country's fuel capacity and defeating its president!

And each of these engaged in and never was suspected of Black Propaganda Campaigns that ruined many lives.

Bad guys tend to get rid of good guys. Sometimes for what they consider good reasons, sometimes for imagined reasons, sometimes because the bad guy just can't *stand* a decent bright person.

But there is no real truth in the bad guys always cause their own downfall. It may come, but it may be far too late to save the reputation or even life of the person being attacked by hidden campaigns.

Therefore it is *vital* to handle the matter. One can't just hope it will all go away. It won't. It will get disastrous to the degree that it is not handled.

The less handling, the more disastrous.

There is another hard won truth.

ONLY COUNTER-ATTACK HANDLES.

The fact is that just going on PRing oneself does not remove the effects of the campaign and all too soon one no longer has communication lines left in order to handle anything since reputation is so destroyed no one will listen and no lines remain.

One has to fill the vacuum of the counter-propagandist's evil deeds. As these are never exposed to view there is a vacuum there.

Another strange thing is that press *will* print attacks. Maybe this will no longer be true in some enlightened age. But in this era, good attacks or fights between things will get print space.

But press is *very* far from the only channel of communication. Governments do believe the press and think it is public opinion. A newspaper can be a fortress of some Black Propagandist. But a people often believes little it reads.

There are opinion leaders, there are letters, there is word of mouth. These are also channels of communication and really far more powerful than the press.

There is also friendly press. But a friendly-talking reporter is often the most suspect. He was so nice in the interview, so vicious in his article.

Statements one makes can be curved. "She had a birthday party" becomes "The delinquents in her circle gathered yesterday for a sex orgy and pretended to the police it was a birthday party. No one was jailed."

The brand of Black Propaganda is very easy to see in writing twists.

So it takes time and work to reverse an attack because normal channels have to be reopened and reversed.

It is done by attacks.

But attacks which are not true earn suits. So one must attack only on proven ground.

This requires a lot of hard search.

However, a Black Propagandist often has *many* other enemies. These have sometimes gathered data.

The principles are that when the sub-terminals are located, they are investigated and counter-attacked. Then further investigation reveals closer terminals to the propagandist and these are attacked. In short, one investigates and attacks.

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Always be ready to parley—that is, have a conference and settle it. The arrogance of the Black Propagandist often forbids this. And when it does, it means longer and harder work and, if well done, his downfall.

In any event, the attack is a long cycle, a complex cycle and often an expensive cycle. It consists of investigate and attack.

But remember, one *must* attack once he has any idea of the identity of the Black Propagandist or even his sub-terminals.

There is no other way out.

Any other course is death.

7. Continue to Fill the Vacuum.

Continuous good works and effective release of material about one's good works is vital especially in a Black Propaganda war.

One cannot just fight.

You are in effect advertising the other fellow when you expose him repeatedly. This gives you a new sort of vacuum. One becomes known as the fellow or company or nation that attacks ______. But who really is this fellow or company or nation?

Pamphlets, brochures, press releases, one's own newspaper and magazine, one's own contacts with opinion leaders, these and many more, must be supplied with A COMPREHENSIBLE IDENTITY OF SELF.

Distributing or using these one publicizes one's own good works.

And one must also *do* good works. One can't just dedicate his life to eradicating the enemy, even when that is tempting.

On the other hand, within the dictates of safety, one cannot hide continuously. One must, through his good works and actions at least, be visible.

So a continual truthful and artful torrent of public relations pieces must occur.

Then one day there is no enemy.

And one's repute is high.

There may be other attacks but now one can handle them as small fires and not as a whole burning forest.

WHAT IS BLACK PROPAGANDA?

You can see that Black Propaganda is a covert attack on the reputation of a person, company or nation, using slander and lies in order to weaken or destroy.

Defense presupposes that the target is not that bad.

One does not have to be perfect to withstand such an attack, but it helps.

But even if one *were* perfect it would be no defense. Almost all the saints in history have been subjected to such attacks. And most of them died of it.

The answer is PR TECHNOLOGY SKILLFULLY APPLIED.

To be skillful in anything, one has to know it and be experienced in it and DO it.

As weary a task as it may seem to some, as heartbreaking as it can be, one still has to *fight*. And fight with tools and technology and dedication superior to that of the enemy.

But progressing and getting small gains, small penetrations, small little skirmishes and battles one at length comes up to victory after victory and at last wins the whole war.

One is saved.

L. RON HUBBARD
Founder

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HCO POLICY LETTER OF 11 MAY 1971
Issue III

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PR Series 7

BLACK PR

About the most involved employment of PR is its covert use in destroying the repute of individuals and groups.

More correctly this is technically called BLACK PROPAGANDA.

Basically it is an intelligence technique.

It can be a serious error to cross Intelligence and PR.

These are two different fields. They have two distinctly different technologies.

A PR man must also know something of intelligence technology. Otherwise one day he will be left gaping.

Intelligence is intelligence. PR is PR.

When you gather information by intelligence procedures and at once employ it for PR, the result is likely to be poor.

It is not that it isn't done. It's that it isn't very effective. Also it is an act of desperation.

PR IS OVERT.

INTELLIGENCE IS COVERT.

PR is at its best when it begins and ends overtly.

Intelligence is best when it begins and ends covertly.

PR with an open demand by known authors, a demonstration, a conference is normal PR.

Intelligence trembles on the edge of PR when filched data explodes a storm in the public. It recoils when the authors are then known.

Black Propaganda is in its technical accuracy, a covert operation where unknown authors publicly effect a derogatory reaction and then remain unknown.

The effect of Black Propaganda is largely wiped out by "Oh, it was the Germans who set them up."

So PR enters intelligence in this way: One finds who set up the Black Propaganda and explodes that into public view.

This use of PR is almost that of an auditor to the group. One is disclosing hidden sources of aberration.

To use intelligence to find where they hid the body and then flip over into wide publicity is not very powerful in actual practice. There better be a body there and one better tell the police not the public.

If there are no effective police, then one has the problem of police action. Exploding it to the public ideally is an effort to make the public a vigilante committee. Modern publics seldom rise this high. Educated publics seldom explode to the explosion.

A PR man who thinks taking Blitz & Company's crimes to the public is really just dreaming hopefully—without foundation. It may or may not hurt Blitz. It might recoil. The ability of the public to stand around and look stupidly at a dripping handed murderer without doing a thing about it is a symptom of our civilization. They *ought* to act. They don't. You can form an opinion amongst them but governing bodies won't consult it.

Exposure is not an effective road to *action*. It can be to opinion. It is slow.

Then what is effective?

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INTELLIGENCE

By definition Intelligence is covert. Under cover. If it is kept so all the way it is effective.

When Intelligence surfaces it becomes very ineffective.

Threat and mystery are a lot of the power of intelligence. Publicity blows it.

Take the Red Orchestra, World War II, Stalingrad Campaign. In Berlin Schultz-Boysen and other highly placed Russian agents got the whole German plan of the battle that was to be Stalingrad. Brilliant and covert intelligence. They passed it to the Russians. Brilliant and covert comm. The boss at Centre in Moscow put the ring's names and addresses in a code radio message. The Germans of course broke the code. The Germans rounded them up and messily executed them on meat-hooks. The Germans had no other battle plans but contemplated not attacking Stalingrad that way. This put the whole coup at risk. Then the Germans did use the plans the Russians knew and that was the beginning of the end of WW II.

So TWO exposures threatened the success of this intelligence coup. One was the stupid radio message. The other was the realization the Russians had the battle plans.

Exposure is the basic threat of intelligence.

PR is the willful broadcast of information.

The two don't mix well.

BLACK PROPAGANDA

Possibly used since the morning pale of history, Black Propaganda was developed by the British and German services in World War I into a fine art.

The word "propaganda" means putting out slanted information to populations.

One propagandizes the enemy population or one's own or neutrals.

In popular interpretation it is a parade of lies or half truths or exaggerations.

PR and advertising technology and mass news media are employed as well as word of mouth and posters.

The trouble with it is that it can often be disproven, discrediting the utterers of it.

It may serve the moment but after a war it leaves a very bad taste.

If one is engaging on a campaign of this nature, its success depends on sticking to the truth and being able to document it.

The entire black propaganda campaign conducted for 21 years against Scientology began to fold up in its 16th year because never at any time did its instigators (a) have any factual adverse data or (b) tell the truth.

The Scientology movement continued if only by heroic means and much sacrifice.

But at last nobody of any note believed the propaganda.

The attackers pulled in on themselves a counter attack based on penetrating horrible documented truth.

It required intelligence-like tactics to discover who it was exactly.

The "dead agent caper" was used to disprove the lies. This consisted of counter-documenting any area where the lies were circulated. The lie "they were ____" is countered by a document showing "they were *not*." This causes the source of the lie and any other statements from that source to be discarded.

That real trouble and damage was caused Scientology is not to be discounted. The brilliance of the defense was fantastic. The depth and inroads the propagandists reached was alarming. BUT THEY DIDN'T MAKE IT.

Some Black Propaganda campaigns have won in other areas, not Scientology.

The British got the US into World War I with Black Propaganda, despite a president elected on a peace platform.

Many individuals have been destroyed by Black Propaganda. Wilhelm Reich was by the lies and violence of the FDA.

So Black Propaganda is not a certain result technology. It is costly. It makes fantastic trouble.

Essentially it is NOT a PR campaign. It is a cross between PR and Intelligence.

The technique is:

A hidden source injects lies and derogatory data into public view.

Since it *is* a hidden source, it requires an intelligence approach to successfully end it.

In the meanwhile the "dead agent caper" is the best tool to counter it.

Legal action can restrain such a campaign but is chancy unless one knows the source or at least has counter-documents. It is risky solely because "law" is unpredictable. However legal action has a definite role in restraining, not in ending such a campaign.

A good policy when faced with a Black Propaganda campaign is to defend as best you can (dead agent and legal restraints) while you find out (intelligence) WHO is doing it. Then, confrontation can occur. Finding and suing false whos can make things much more involved.

Black Propaganda counter-campaigns are inevitable. One engages upon them whether he would or no. These are engaged on while one narrows down the area to an exact WHO. For instance, one knows the whatsits are attacking one. Thus he can counter-attack the whatsits. But *what* are the whatsits exactly? and to whom are they connected? and exactly WHO, an individual always, is keeping it going? These last three have to be answered eventually. And that requires an intelligence type search.

THE CROSS

So there is where Intelligence and PR cross.

When PR goes into Black Propaganda (hidden source using lies and defamation to destroy) it has crossed intelligence with publicity. They don't mix well.

The action is risky to engage upon as it may run into an ex-intelligence officer or trained intelligence personnel. It may also run into a dead agent caper or legal restraint.

Anyone engaging in Black Propaganda is either using a wrong way to right a wrong or confessing he can't make it in open competition.

PROTEST PR

Outright Protest PR, based on facts is a legitimate method of attempting to right wrongs.

It has to be kept overt. It has to be true.

Protest PR can include demonstrations, hard news stories and any PR mechanism.

Minorities have learned that only Protest PR can get attention from politicians or lofty institutions or negligent or arrogant bosses.

Where Protest PR is felt to be a necessity, *neglect* has already occurred on the issues.

The riots of Panama some years ago were very violent, verging on open war. This followed the negligence of the US in negotiating new treaties, a matter arranged for long ago and arrogantly skipped for several years by the US.

The slaves were freed in 1864 but were either misused or neglected for the next century and finally became a key racial problem full of demonstrations and riots and social unrest. Imperfect redress of wrongs following these then continued the riots. This is probably the biggest PR mess of the last century and a half wobbling this way and that. It is still in the stage of Protest PR, possibly because it went so very, very long unhandled.

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The only real recourse these people had was Protest PR. Recently, black Congressmen were refused audience by the President and had to stage a demonstration before it was granted. But Protest PR *did* obtain an audience.

The silliest idea of modern times is conscription. Drafted soldiers might possibly be excused as a levee en masse but not as the habit of government in peace and war just to overcome their lack of ability to make the country worth fighting for and the armed services a stable attractive career. This is all the more foolish since hardly anyone in history ever had any trouble recruiting an army that could pay for one. Even Gibbon remarks on it as an amazingly easy thing to do in any civilization. And that is true today.

So conscription is continued. Facing every young man with an arbitrary military future was a bad thing. Napoleon invented it and he lost.

Protest PR was the answer used to contest it. Met by force and violence, it has not halted.

Somebody will have to give the country a nobler cause more decently prosecuted, will have to better the services and conditions and will have to admit men without demanding their right names or perfect physique and make them immune to recall for civil offenses. Probably that army would fight well. Conscript services are too expensive, too inefficient and too ready to revolt for any sane government to use them. But here this unhandled wrong has to resort to Protest PR.

So Protest PR has its place. It is a fine art. It is the subject of fantastic skill and tech.

It is not good. But it does work and it is used as a last resort when normal hearings and good sense fail.

When money and force lead and opinion leaders are unheeded, when special privilege enters management or government, Protest PR, the strike, the demonstration, is the tool employed.

If that doesn't work, or if it is crushed, subversive actions, general intelligence actions, Black Propaganda and other evils occur.

PR used soon enough can avert much of these consequences.

But there are always two in any fight and the other side may not want to live and so set themselves up.

Intelligent early PR is the best remedy. But it is not always possible.

L. RON HUBBARD
Founder

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LEVEL 0 CHECKSHEET

BY L. RON HUBBARD

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Dissemination of Material

The dissemination of materials of Scientology is a problem of comparable stature to the use of techniques on a preclear in an auditing session. Just as you would not process a preclear with heavy processes when all he could take might be ARC Straight Wire, thus you would not issue Scientology materials of considerable weight to people incapable of assimilating them.

The immediate result of the issuance of materials not intended for that audience is to produce a state of confusion in the minds of that audience regarding Scientology. Here we have no question of talking down to people. Here we have no question of 'watering' our material, but we do have a question of disseminating Scientology. If we do it properly, then Scientology will be very broadly known. If we do it improperly it will stop in its tracks, and be known, if at all, as a confusion.

When materials are issued above the acceptance level of an audience, a confusion results. A confusion is the antithesis of a flow. Any communication resulting in a confusion then brings about an eddy or tumbling of particles rather than their spread. And a confusion at length becomes a mystery.

Part ten of the Code of a Scientologist says: "I pledge myself to engage in no unseemly disputes with the uninformed on the subject of my profession." This is an immediate injunction not to start an eddy of confusion. The employment of Scientology to the greatest good of the greatest number of Dynamics does not include using it knowingly or unknowingly to confuse hearers.

An outline of the communication lines of Scientology follows:

1. The General public to the general public.
2. Scientologists to the general public.
3. Member HASI to member HASI.
4. Trained Scientologist to a member of the HASI.
5. Member of the HASI to a preclear.
6. Trained Scientologist to a preclear.
7. Trained Scientologist to a trained Scientologist.
8. HASI to membership.
9. HASI to trained Scientologist.
10. HASI to the general public

1. GENERAL PUBLIC TO THE GENERAL PUBLIC

There are several things we would like the general public to say to the general public about Scientology. The first of these is that we would like the general public, when it sees an individual or group problem, to be quite certain that the proper thing to do is for that individual or group to consult a Scientologist. For instance, if somebody is having headaches, we would like his friends to come to the obvious solution that this person should see a Scientologist or should join a group undergoing processing.

The next on this communication line is that Scientology does not pose any threat, that Scientologists are good citizens, and that they can be trusted with problems of a private and confidential nature, or with problems dangerous to other people, such as the problem of criminality. Another frame of mind we would like to see the public have and register is that people attacking Scientologists have something wrong with them (and if you could meet any such people personally you would see that this is no more than truth). As a subdivision of this, the actual substance of communication about what Scientology is, from the general public to the general public, should be that Scientology says that good health and immortality are attainable. That it is something compounded out of all Man knows of the subject of Man, and that people are living units operating bodies, rather than bodies, and that this living unit is the human soul. Given this much communication line, the general public can embroider enormously, and unless a person in the general public can express his opinions, and unless the subject gives him a chance to express his own opinions, and so let HIM be interestING, he will not talk about the subject. Thus the data in the general public should give individuals a chance to be interesting, by knowing no more and no less than the above. We are not interested in sensationalism personalities, or the complexity of Scientological methodology being discussed by the general public. As a subdivision of this, we do not want Scientology to be reported in the press, anywhere else than on the religious page of newspapers. It is destructive of word of mouth to permit the public presses to express their biassed and badly reported sensationalism. Therefore we should be very alert to sue for slander at the slightest chance so as to discourage the public presses from mentioning Scientology. What the newspapers say is not word of mouth. As an example of this, how many minutes today have you spent in discussing current events? NEWSPAPER REPORTERS WRITING ARTICLES ON SCIENTOLOGY DO NOT EXPRESS SCIENTOLOGY. Scientologists should never let themselves be interviewed by the press. That's experience talking!

As a subdivision of general public to general public we have the problem of the professions which might consider Scientology to be antipathetic to them, amongst these would be psychologists and medical doctors as well as psychiatrists. These persons are entirely in error when they express the opinion that Scientologists are against them. Scientology does not consider them sufficiently important to be against. Flour-pills or any incantation or system will produce in 22 per cent. of the public, benefit. Therefore, any practice or art can always achieve 22 per cent. recovery in their patients. It is when we better this 22 per cent. that we are being efficient. We have no more quarrel with a psychologist than we would have with an Australian witch-doctor. We have no quarrel with a pychiatrist any more than we should quarrel with a barbarian because he had never heard of nuclear physics. And as for the medical doctor, we know very well that modern medical practice, having lately outgrown phlebotomy, has come of age to point where it can regulate structure in a most remarkable and admirable way. In Scientology we believe a medical doctor definitely has his role in a society just as an engineer has his role in civil government. We believe that a medical doctor should perform emergency operations such as those made necessary by accidents; that he should perform orthopaedics; that he should deliver babies; that he should have charge of the administration of drugs; that his use of antibiotics is beneficial; and that wherever he immediately and curatively addresses structure he is of use in a community. The only place we would limit a medical doctor is in the field of treatment of psychosomatic medicine, where he has admittedly and continuously failed, and the only thing we would ask a medical doctor to change about his practice is to stop taking money for things he knows he cannot cure, i.e., spiritual, mental, psychosomatic, and social ills.

With regard to psychologists, medical doctors, and psychiatrists, then, what would one say in talking with them? But again we have section 10 of the Code of the Scientologist. You wouldn't expect this psychologist, or phychiatrist, or medical doctor to get into an argument with you on how to get rats or find their way through mazes, how you would set a tibia, or what voltage you would put on an electric shock machine. Therefore, and equally, do not permit yourself to be put in the situation where you are discussing privately or in public, the methodologies of your wisdom. The attitude of a Scientologist toward people is these professions should be: "I have my techniques. It took me a long time to learn them just as it took you a long time to learn yours, and I am not going to try to make a minister out of you, and you are not going to try to make a medical doctor (psychiatrist, psychologist) out of me. I am an expert instructor only where it is intimately involved with the human spirit. I can produce my effects. You can produce yours. In view of the fact that you do not pretend to operate in the field of the human spirit, and I do not pretend to operate in the field of structure, I do not see how there can be any discussion. But things that I can't handle in structure when called upon I will be very happy to refer to you, and I shall expect that when matters of the spirit come into question you will have enough understanding of life, where we are all specialists, to refer them to me" A quiet explanation of this character will do a great deal to place you as a professional man in their realm of understanding of professional men.

Should anyone challenge you for having suddenly secured a relief in a hospital or an institution from some dire malady which balked the efforts of the professional men in charge of it, and should you ever be "called upon the carpet" for having "interfered" with the progress of a case, you should be extremely dismayed, and act it, to find yourself in the presence of barbarians who do not believe in the power of prayer, in the will of God, or the promises of Jesus Christ. And you should point out that, whereas the body was in their keeping, they did not at any time care to take purview of the human soul. And if anything has occurred because the soul, in your province, then reacted upon the body, you believe that they are unwilling to admit the will of God in their treatment of human beings, and if this is the case you now, while you are being addressed by such people, discover yourself to be in a strange place where men pretending to be Christians doubt God, the Son of God, and the power of prayer. Your entire address to such people, in such a situation, publicly or privately, should be entirely overt, accusative, and not at any time apologetic. And you should immediately make it your business to place this matter before the proper authorities, that people are in charge of an institution here, are not Christians, and do not believe in God, and you should inform your accusers that you are going to do so.

Should you ever be arrested for practicing Scientology, treating people, make very sure, long before the time comes, that you have never used drugs or surgery, and that you have never prescribed a diet, or vitamins, and when that time might come, make very sure that you immediately and instantly, within two or three hours after your receipt of the warrant, have served upon the signer of that warrant, a personal civil suit for $100,000.00 damages for having caused the arrest of a Man of God going about his business in his proper profession, and for having brought about embarrassing publicity and molestation. Place the suit and WIRE THE HASI IMMEDIATELY. Make the whole interest during the entire time of such an unfortunate occurrence the fact that the signer of such a warrant, who would ordinarily be a medical doctor in charge of the medical department of some city, had dared fly in the teeth of religion. And use what is necessary of the earlier passage above to drive the point home. DO NOT simply fall back out of communication if you are attacked, but attack, much more forcefully and artfully and arduously. And if you are foolish enough to have an attorney who tells you not to sue, immediately dismiss him and get an attorney who will sue. Or, if no attorney will sue, simply have an HASI suit form filled out and present it yourself to the county clerk in the court of the area in which your case has come up.

IN ALL SUCH CASES OR ARREST FOR THE PRACTICE OF SCIENTOLOGY, THE HASI WILL SEND A REPRESENTATIVE AT ONCE, BUT DO NOT WAIT FOR HIS ARRIVAL TO PLACE THIS SUIT. THE SUIT MUST ALREADY HAVE BEEN FILED WHEN THE HASI ATTORNEY ARRIVES.

In other words, do not, at any moment leave this act unpunished. for, if you do you are harming all other Scientologists in the area. When you are attacked it is your responsibility then to secure from further attack not only yourself but all those who work with you. Cause blue flame to dance on the court house roof until everybody has apologized profusely for having dared to become so adventurous as to arrest a Scientologist who, as a minister of the church, was going about his regular duties. As far as the advances of attorneys go that you should not sue, that you should not attack, be aware of the fact that I, myself, in Wicnita, Kansas, had the rather interesting experience of discovering that my attorney employed by me and paid by me, had been for some three months in the employ of the people who were attacking me, and that this attorney had collected some insignificant sum of money after I hired him, by going over to the enemy and acting upon their advices. This actually occurred. so beware of attorneys who tell you not to sue. And I call to your attention the situation of any besieged fortress. If that fortress does not make sallies, does not send forth patrols to attack and harass, and does not utilize itself to make the beseiging of it a highly danger-
ous occupation, that fortress may, and most often does, fall.

The DEFENSE of anything is UNTENABLE. The only way to defend anything is to ATTACK, and if you ever forget that, then you will lose every battle you are ever engaged in, whether it is in terms of personal conversation, public debate, or a court of law. NEVER BE INTERESTED IN CHARGES. DO, yourself, much MORE CHARGING, and you will WIN. And the public, seeing that you won, will then have a communication line to the effect that Scientlo- gists WIN. Don't ever let them have any other thought than that Scientology takes all of its objectives.

Another point directly in the interest of keeping the general public to the general public communication line in good odor: it is vitally important that a Scientologist put into action and overtly keep in action Article 4 of the Cole: "I pledge myself to punish to the fullest extent of my power anyone misusing or degrading Scientology to harmful ends." The only way you can guarantee that Scientology will not be degraded or misused is to make sure that only those who are trained in it practice it. If you find somebody practicing Scientology who is not qualified, you should give them an oppor-
tunity to be formally trained, at their expense, so that they will not abuse and degrade the subject. And you would not take as any substitute for formal training any amount of study.

You would therefore delegate to members of the HASI who are not otherwise certified only those processes mentioned below, and would discourage them from using any other processes. More par-
ticularly, if you discovered that some group calling itself "precept processing" had set up and established a series of meetings in your area, that you would do all you could to make things interesting for them. In view of the fact that the HASI holds the copyrights for all such material, and that a scientific organization of material

can be copyrighted and is therefore owned, the least that could be done to such an area is the placement of a suit against them for using materials of Scientology without authority. Only a member of the HASI or a member of one of the churches affiliated with the HASI has the authority to use this information. The purpose of the suit is to harass and discourage rather than to win.

The law can be used very easily to harass, and enough harassment on somebody who is simply on the thin edge anyway, well knowing that he is not authorized, will generally be sufficient to cause his professional decease. If possible, of course, ruin him utterly.

A D.Scn. has the power to revoke a certificate below the level of D.Scn. but not a D.Scn. However, he can even recommend to the *CECS of the HASI that D.Scns. be revoked, and so any sincere Scientologist is capable of policing Scientology. This is again all in the interest of keeping the public with a good opinion of Scientology, since bad group processing and bad auditing are worse than bad publicity and are the worst thing that can happen to the general public to general public communication line.

The best thing that can happen to it is good auditing, good public presentation, and a sincere approach on the subject of Scientology itself. Remember, we are interested in ALL treatment being beneficial, whether it is Scientology or not. For bad treatment in any line lowers the public opinion of all treatment.

In addressing persons professionally interested in the ministry, we have another interesting problem in public presentation. We should not engage in religious discussions. In the first place, as Scientologists, we are gnostics, which is to say that we know what we know. People in the ministry ordinarily suppose that knowingness and knowledge are elsewhere resident than in themselves. They believe in belief and substitute belief for wisdom. This makes Scientology no less a religion, but makes it a religion with an older tradition and puts it on an intellectual plane.

Religious philosophy, then, as represented by Scientology, would be opposed in such a discussion to religious practice. We are all-denominational rather than non-denominational, and so we should be perfectly willing to include in our ranks a Moslem, or a Taoist, as well as any Protestant or Catholic, while people of the ministry in Western civilization, unless they are evangelists, are usually dedicated severely to some faction which in itself is in violent argument with many other similar factions. Thus these people are ready to argue and are practiced in argument, and there are more interpretations of one line of scripture than there are sunbeams in a day. Beyond explaining one's all-denominational character, explaining that one holds the Bible as a holy work, one should recognize that the clergy of Western Protestant churches defines a minister or the standing

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*Committee for Examinations, Certification and Services of a church by these salient facts: Jesus Christ was the Savior of Mankind, Jesus Christ was the Son of God.

We in Scientology find no argument with this, and so in discussing Scientology with other ministry one should advance these two points somewhere in the conversation. Additionally, one should advance to the ministry exactly those things mentioned earlier as what we would like the general public to believe. Christ, if you care to study the New Testament, instructed his disciples to bring wisdom and good health to man, and promised mankind immortality, and said the Kingdom of Heaven was at hand, and the translators have not added that "at hand" possibly meant three feet back of your head. We could bring up these points but there is no reason to. You are not trying to educate other ministry. A friendly attitude toward other ministry in general, and fellow ministers in particular, is necessary.

The way to handle an individual minister of some other church is as follows: get him to tell you exactly what HE believes, get him to agree that religious freedom is desirable, then tell him to make sure that if that's the way he believes, he should keep on believing that, and that you would do anything to defend his right to believe that.

None of these people as individuals are antipathetic. They know a great deal about public presence, and can be respected for such knowledge. However, engaging in long discourses, or trying to educate a minister of some Protestant church or a priest of the Catholic faith into the tenets of Scientology is not desirable and is directly contrary to Article 10 of the Code of a Scientologist.

You will find you have many problems and people in common with other ministers. They're alive too. Also you will see a campaign to place only ministers in charge of the mind, and mental healing. Talk about these things.

The Christian Church has been hurt by factionalism. We stand for peace and happiness. Therefore, let us carry it forward by example, not by unseemly discussions.

2. SCIENTOLOGISTS TO THE GENERAL PUBLIC

In the assemblage of congregations, and in addressing the general public at large, a Scientologist has a responsibility to give to the public, in the form of such congregations or meetings, information acceptable to them, which can be understood by them, and which will send them away with the impression that the Scientologist who addressed them knew definitely what he was talking about and that Scientology is an unconfused, clear-cut subject.